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# Drew School Addition 2901 California Street / 1831-1835 Broderick Street

PLANNING DEPARTMENT CASE NO. 2007.0128E

STATE CLEARINGHOUSE NO. 2008032039



SAN FRANCISCO  
**PLANNING**  
DEPARTMENT

Draft EIR Publication Date:	OCTOBER 8, 2008
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Draft EIR Public Comment Period:	OCTOBER 8, 2008 – NOVEMBER 23, 2008

*Written comments should be sent to:*

Environmental Review Officer | 1650 Mission Street, Suite 400 | San Francisco, CA 94103

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# **DREW SCHOOL ADDITION 2901 CALIFORNIA STREET/1831-1835 BRODERICK STREET**

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## **DRAFT ENVIRONMENTAL IMPACT REPORT**

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**Planning Department Case No. 2007.0128E**

State Clearinghouse No. 2008032039

October 8, 2008

EIR Publication Date: October 8, 2008

EIR Public Hearing Date: November 13, 2008

EIR Public Comment Period: October 8, 2008 to November 22, 2008

Send written comments on this document to:

Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

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# SAN FRANCISCO PLANNING DEPARTMENT

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**DATE:** October 8, 2008

**TO:** Distribution List for the 2901 California Street – Drew School Addition Draft EIR

**FROM:** Bill Wycko, Acting Environmental Review Officer

**SUBJECT:** Request for the Final Environmental Impact Report for the 2901 California Street – Drew School Addition Project (Planning Department File No. 2007.0128E)

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This is the Draft of the Environmental Impact Report (EIR) for the 2901 California Street – Drew School Addition Project. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, our office will prepare and publish a document titled "Comments and Responses," which will contain all relevant comments on this Draft EIR and our responses to those comments. It may also specify changes to this Draft EIR. Those who testify at the hearing on the Draft EIR will automatically receive a copy of the Comments and Responses document, along with notice of the date reserved for certification; others may receive a copy of the Comments and Responses and notice by request or by visiting our office. This Draft EIR together with the Comments and Responses document will be considered by the Planning Commission in an advertised public meeting and will be certified as a Final EIR if deemed adequate.

After certification, we will modify the Draft EIR as specified by the Comments and Responses document and print both documents in a single publication called the Final EIR. The Final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. It will simply provide the information in one document, rather than two. Therefore, if you receive a copy of the Comments and Responses document in addition to this copy of the Draft EIR, you will technically have a copy of the Final EIR.

We are aware that many people who receive the Draft EIR and Comments and Responses have no interest in receiving virtually the same information after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the Final EIR [in Adobe Acrobat format on a CD] to private individuals only if they request them. Therefore, if you would like a copy of the Final EIR, please fill out and mail the postcard provided inside the back cover to the Major Environmental Analysis division of the Planning Department within two weeks after certification of the EIR. Any private party not requesting a Final EIR by that time will not be mailed a copy. Public agencies on the distribution list will automatically receive a copy of the Final EIR.

Thank you for your interest in this project.



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# Drew School Addition Draft Environmental Impact Report

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# I. SUMMARY

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## A. INTRODUCTION

This document is a Draft Environmental Impact Report (EIR), prepared in accordance with the California Environmental Quality Act (CEQA)<sup>1</sup> for the Drew School Addition project (the "proposed project"). This EIR has been prepared by Planning Department as Lead Agency,<sup>2</sup> pursuant to all relevant sections of the California Environmental Quality Act ("CEQA"). Under the San Francisco Administrative Code, Chapter 31, the San Francisco Planning Department is responsible for CEQA review for all City and County of San Francisco projects and therefore serves as the Lead Agency. The EIR is intended to serve as a public disclosure document that informs the San Francisco Board of Supervisors ("Board of Supervisors"), Planning Commission, other Responsible Agencies,<sup>3</sup> and the general public of the potential environmental consequences of the proposed project and to present mitigation measures and feasible alternatives to avoid, eliminate, or reduce the environmental effects of that project prior to consideration for approval. An application for an environmental evaluation for the Drew School Addition project was filed with the San Francisco Planning Department (Department) on January 18, 2007. On the basis of the Initial Study published on March 8, 2008, the Department determined that an EIR is required (see Appendix A: Initial Study).

## B. PROJECT DESCRIPTION

The project sponsor, Drew School, proposes to demolish an existing 45-foot-tall, three-story-over-basement residential building at 1831-1835 Broderick Street (Assessor's Block 1029, Lot 3), and construct a three-story-over-basement, 40-foot-tall addition to the existing Drew School building at 2901 California

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<sup>1</sup> California Public Resources Code Section 21000 et seq.

<sup>2</sup> CEQA Guidelines define the "Lead Agency" as the public agency that has the principal responsibility for carrying out or approving a project. The Planning Department would be responsible for carrying out the proposed project, including making various specific future implementation decisions.

<sup>3</sup> Under CEQA Guidelines, the term "Responsible Agency" includes all public agencies, other than the Lead Agency, which have discretionary approval power over aspects of the project for which the Lead Agency has prepared an EIR.

Street (Assessor's Block 1029, Lot 95). The purpose of the project is to develop an approximately 15,600-square-foot addition to the existing Drew School building that would provide state-of-the-art space for an assembly room/theater, rehearsal space, and classrooms that is of a size sufficient to support Drew School's program in drama, music and the arts. The objectives of the project sponsor are listed on page 27.

The proposed project site is in San Francisco's Lower Pacific Heights neighborhood on the west side of Broderick Street near California Street (see Figure 1, page 14). 1831-1835 Broderick Street contains a three-story residential building (acquired by the school in 2004) on a 2,269-square-foot (0.05 acre) lot on the southern end of the site. The 5,225-square-foot residential building at 1831-1835 Broderick Street was constructed in 1891 and is considered an historic resource. The 2901 California Street lot to the north contains the existing Drew School building, courtyard, and basement parking garage on a 15,732-square-foot (0.36 acre) parcel. The site slopes gently downward to the south and east. The site is within the Residential, Mixed, Low Density (RM-1) zoning district and the 40-X height and bulk district.

The approximately 15,604-square-foot addition to the existing 26,470 gsf Drew School<sup>4</sup> would be constructed on the Broderick lot and on part of the existing school courtyard. The addition would contain additional classrooms, assembly room/theater, rehearsal space, tech gallery, scenery loft, green room (staging/rehearsal room), restrooms, and circulation space. After completion of the proposed project, Drew School would contain a total of approximately 42,074 square feet. The existing 21-space basement/underground parking garage would not change. The main entrance to the school would continue to be on California Street, with secondary entrance on Broderick Street.

The proposed addition would incorporate a green "living wall" facing Broderick Street, covered with vegetation to enhance the habitat value of the site. The project would include a roof design that utilizes vegetation and surfaces with high solar reflectance to reduce urban heat island effects. The project development team would apply for certification that the new facility meets Leadership in Energy and Environmental Design (LEED) Green Building Rating System criteria for New Construction (LEED NC). The design would also incorporate several strategies which are part of the pilot version of LEED for Schools, a new standard being developed by the US Green Building Council.

The existing enrollment of about 243 students and 52 full and part-time faculty would increase to a maximum of 280 students and add three staff persons (an increase of about 15 percent). The project would require a new Conditional Use authorization, a variance from the rear yard requirement, and mandatory discretionary review for demolition of a residential building.

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<sup>4</sup> The Conditional Use Authorization motion indicates that the existing school is 22,500 square feet, and does not include basement parking or building services.



If approved, construction of the proposed project would occur over approximately 13 months.

## **C. MAIN ENVIRONMENTAL EFFECTS**

This EIR focuses on the issue of historical resources and considers cumulative impacts including those on land use. The Initial Study found that the aesthetic and transportation impacts of the proposed project would be less than significant, therefore, discussion of these issues is included informational purposes. The Initial Study concluded that all other potential environmental effects were less than significant or could be reduced to a less-than-significant level with implementation of mitigation measures, with the exception of impacts to historical resources. (Please see the Initial Study, included in this document as Appendix A, for analysis of other environmental issues.) A section on other CEQA issues and areas of controversy is also included in this EIR in Chapter V.

### **LAND USE** (page 30)

This section evaluates land use and planning impacts. The proposed project would expand educational/institutional use on the project site, but would not physically divide an established community, introduce new or incompatible land uses to the area, conflict with adopted land use plans, or substantially and adversely alter the land use intensity or character of the vicinity. The proposed project's land use impacts would be less than significant.

### **AESTHETICS** (page 36)

This section evaluates aesthetic impacts. The proposed project would not have a substantial demonstrable negative effect on a scenic vista, damage scenic resources, substantially affect private views, substantially degrade the site's or surrounding area's visual character, or create a new source of offensive light and glare. The proposed project would have a less-than-significant aesthetic impact, both project-specific and cumulative.

### **HISTORIC ARCHITECTURAL RESOURCES** (page 41)

This section evaluates impacts on historic architectural resources. The 1831-1835 Broderick Street building is not individually historically significant for its design and construction due to loss of integrity.

The 1831-1835 Broderick Street building does retain integrity of location, design, setting, feeling, and association. The high concentration of architecturally cohesive and intact residential buildings in the project neighborhood indicates the existence of a potential district based on shared architectural

characteristics. The 1831-1835 Broderick Street building, constructed during the period of significance (1880s through the early 1990s), is a contributor to this potential historic district. Therefore, the 1831-1835 Broderick Street building is considered an historical resource under CEQA.

Demolition of the 1831-1835 Broderick Street building as part of the proposed project would have a substantial adverse impact on historically important architectural resources. Implementation of Mitigation Measures 1, 2 and 3 (pages 68 to 68) would reduce this impact, but the loss of the historical resources would remain significant and unavoidable.

## **TRANSPORTATION/CIRCULATION** (page 53)

This section evaluates impacts on transportation. The project would not have any significant project-specific or cumulative impacts on intersection operation. However, implementing Improvement Measures 1 through 4, beginning on page 67, would reduce already less-than-significant vehicle/vehicle and vehicle/pedestrian conflicts.

The proposed project would have a less than significant impact on transit operations, pedestrian and bicycle conditions, and loading.

The project would not cause a significant environmental impact on parking; however, encouraging alternative modes of travel and car-sharing would lessen parking impacts (see Improvement Measure 4, page 73) and is consistent with the existing Conditional Use authorization conditions.

The impacts of construction on parking and traffic would be limited in scope and temporary in duration, and would not be significant. However, limiting construction-related truck traffic during peak periods and relocating the existing white zone from Broderick Street to California Street during the construction period would lessen construction period impacts (see Improvement Measure 5, on page 74).

## **GROWTH INDUCEMENT** (page 65)

The project's elimination of three existing residential units and the housing demand of the three additional employees would be small relative to the current number of vacant residential units in San Francisco, and the project's additional capacity for students would not encourage a substantial population increase. The proposed project would be located in an urbanized area and would not provide new infrastructure that would increase existing utility service capacity. For these reasons, the proposed project would not cause significant growth-inducing impacts.



## D. MITIGATION AND IMPROVEMENT MEASURES (page 67)

This Draft EIR includes six mitigation measures that would avoid potentially significant impacts and seven improvement measures proposed to reduce less-than-significant project effects. Measures from the Initial Study (see Appendix A) are indicated with an asterisk (\*).

*Mitigation Measure 1 – Historical Architecture (Documentation)* would document the existing residential building: with a video documentary; photo-documentation of the interior and exterior of the building; and conserving the available original plans of the building. It is not possible to mitigate the loss of a resource significant for its historic association and architecture with photographic documentation or original architectural plans. Therefore, impacts related to the demolition of the 1831-1835 Broderick Street building would remain significant and unavoidable.

*Mitigation Measure 2 – Historical Architecture (Salvage).* The extant character-defining features of the 1831 – 1835 Broderick building, including the paneled surfaces of the recessed entrance porch, the glazed entrance doors, and the arch topped wooden sash, would be salvaged for reuse, optimally within the identified historic district. Impacts related to the demolition of the 1831-1835 Broderick Street building would remain significant and unavoidable.

*Mitigation Measure 3 – Historical Architecture (Historic District)* would address the cumulative impact of the demolition of the potentially contributing resource on the potential historic district. The measure specifies that data collected in the course of the review be assembled for use supporting possible future historic district designation.

- (\*) *Mitigation Measure 4 – Archeology (Accidental Discovery)* would mitigate the potentially significant impact on archeological resources that may arise if an archeological resource is present at the project site. The measure indicates specific actions to be taken if an accidentally discovered buried or submerged historical resource is accidentally discovered. The measure includes alerting all construction and excavation staff; notification of the Environmental Review Officer (ERO) if there is any indication of an archeological resource; hiring an archeological consultant at the direction of the ERO; and additional measures as specified by the ERO.
- (\*) *Mitigation Measure 5 – Construction Air Quality* would mitigate the potential impact of construction on air quality, and includes such directives as: watering construction areas; covering trucks hauling soils; washing all truck wheels; installing wind breaks; suspending soils disturbing activities when wind speeds are high; and limiting excavation, grading, and other construction activities to one area at a time.

- (\*) *Mitigation Measure 6 – Hazardous Materials in Existing Buildings (PCBs, Mercury, Lead and Others)* would mitigate the potential impact of the release of hazardous materials during demolition and specifies that prior to demolition, a survey be performed for PCB- and mercury-containing equipment, fluorescent lights, lead, mercury, Naturally Occurring Asbestos (NOA), organochlorine pesticides, and other potentially toxic materials, and that any hazardous materials so discovered be abated according to regulations.

*Improvement Measure 1 – Cumulative Land Use Conversion.* The Planning Department would continue to develop, within six months time of FEIR certification, geographic information system analysis of Conditional Use authorizations for changes of residential land use to other use types within the Residential and Neighborhood Commercial Districts along the Sacramento Street through Pine Street corridors of lower Pacific Heights using existing Planning Department data, including age of structure and demolition or new construction. The information resulting from this analysis would be forwarded to the Citywide, long-range planning division of the Department, and Preservation Coordinator for use supporting future surveys and area plans.

- (\*) *Improvement Measure 2 – Extend White Zone Along Broderick Street* would reduce potential vehicle/vehicle and vehicle/pedestrian conflicts. This measure would extend the length of the white zone identified in the 1999 Conditional Use application approximately 37.5 feet and would be subject to approval by Department of Parking and Traffic.
- (\*) *Improvement Measure 3 – Modify Timing and Operation of White Zone* would reduce potential vehicle/vehicle and vehicle/pedestrian conflicts. This measure would adjust the timing of the current white zone in order to more accurately match school pick-up and drop-off times: 7:30 to 8:30 a.m. and 2:30 to 3:30 p.m.
- (\*) *Improvement Measure 4 –Implement School Traffic Demand Management program and Encourage Alternate Modes of Travel.* The School will continue to implement a program of traffic demand management with incentives for ridesharing, bicycle riding and walking by staff and faculty; and facilitate secure bicycle parking within the garage or proximate to the school entry. The School aims for an effective overall reduction of single-ridership by staff and faculty by 25 percent.

The School would implement a No Net Increase Policy in traffic to and from the school through an incentive program for walking and biking, provision of secure bicycle parking, an education program to stress the environmental and health benefits of trip reduction, and a carpooling program managed the School and/or the PTA. The School would provide annual reports (with copies to the City) on the effectiveness of the program in reducing school drop-offs relative to enrollment.



- (\*) *Improvement Measure 5 – Construction Traffic Measures* would minimize disruption of the general traffic flow on adjacent streets during construction. The measure calls for the limiting the time of truck movements, meeting City agencies to determine feasible traffic measures, and hiring a flagman to direct construction vehicle ingress and egress.
- (\*) *Improvement Measure 6 – Construction Noise Measures* would reduce the proposed project's construction noise effect by limiting construction hours; muffling equipment; utilizing "quiet" equipment and locating stationary equipment far from sensitive receptors; erecting a noise control screen; designating a "noise disturbance coordinator" to receive complaints; and post contact information around the project site.

*Improvement Measure 7 – Control of Public Nuisances.* The School will continue to maintain a community liaison officer to receive complaints and communicate to the school community and neighbors the expectations of conduct and penalties for failure to comply or respond to concerns regarding such student behavior as loitering, smoking, and excessive noise making.

## **E. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED (page 77)**

The proposed project, with mitigation, would have the following unavoidable significant historical architectural resources impact:

The existing building at 1831-1835 Broderick Street is an historical resource because of its contribution to a potential historic district. Demolition of this building as part of the proposed project would have a substantial adverse impact. Implementation of Mitigation Measures 1, 2 and 3, pages 68 to 69, documenting the existing building and salvaging historical character-defining materials from the existing building, would not mitigate the adverse impact to a less-than-significant level, and the impact would remain significant and unavoidable. The proposed project may also contribute to a cumulative impact on the potential historic district. Should the Planning Commission approve the project as proposed, it would be required to make a finding that the proposed project would have a significant project-specific environmental impact and would adopt a Statement of Overriding Considerations.

With implementation of the mitigation measures outlined in Chapter IV: Mitigation and Improvement Measures of this report, all other potential significant impacts would be less-than-significant or would be reduced to a less-than-significant level.

## **F. OTHER CEQA ISSUES (page 78)**

This EIR focuses on historic architectural resource issues. Aesthetics, land use, and transportation are discussed for informational purposes. Nuisance issues such as loitering and related concerns, while not

I. SUMMARY

considered potentially significant impacts, would be reduced through implementation of Improvement Measure 7 and enforcement of conditions of approval. With mitigation measures agreed to by the project sponsor, all other potential environmental effects were found to be less than significant or reduced to a less-than-significant level.

With the publication of the Draft EIR, there will be a period of formal public comment on the adequacy of the environmental analysis of the Draft EIR from \* \_\_\_\_\_ to \* \_\_\_\_\_, 2008, with a public hearing before the Planning Commission scheduled for \* \_\_\_\_\_, 2008. A Comments and Responses document will be prepared that includes all comments submitted at the hearing or in writing during this period, contains written responses to the comments, and specifies any changes to the DEIR. This document, together with the DEIR, will constitute the Final EIR (FEIR). The Planning Commission will decide on the adequacy of the environmental analysis contained in the FEIR during a certification hearing.

## **G. ALTERNATIVES TO THE PROPOSED PROJECT** (page 79)

The *CEQA Guidelines* require analysis of a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the project's basic objectives but would avoid or substantially lessen any of the significant effects of the project. Decision-makers must consider approval of an alternative if the alternative would substantially lessen or avoid significant environmental impacts identified for the proposed project and the alternative is determined to be feasible.

The following alternatives are evaluated in this chapter: the No Project Alternative; the Preservation Alternative; the Partial Preservation Alternative; and the Residential Guidelines Alternative. A discussion of the environmentally superior alternative is also included in this chapter, as required by CEQA. The table on the following page compares features of the alternatives.



**ALTERNATIVES COMPARISON TABLE**

Environmental Topic	Proposed Project	No Project Alternative	Preservation Alternative	Partial Preservation Alternative	Residential Guidelines Alternative
	Demolish existing three-story residential building, construct three-story-over-basement, 15,604-square-foot addition to Drew School	No development; site remains as it is currently	Rehabilitate existing three-story residential building, adaptively reuse as part of expanded Drew School	Retain first 15 feet of the existing three-story residential building's volume, construct addition to Drew School behind	Demolish existing three-story residential building, construct addition to Drew School with frontage conforming to Residential Design Guidelines
<b>Land Use</b>					
Neighborhood Character and Compatibility	LTS	NI	LTS	LTS	LTS
Consistency with Applicable Land Use Plans and Policies	LTS	NI	LTS	LTS	LTS
<b>Aesthetics</b>					
Visual Character and Scenic Resources	LTS	NI	LTS	LTS	LTS
Views	LTS	NI	LTS	LTS	LTS
Light and Glare	LTS	NI	LTS	LTS	LTS
<b>Historical Architectural Resources</b>					
Historic Resources Impacts	SU	NI	LTS	SU	SU
Cumulative Historic Resources Impacts	PS	NI	LTS	LTS/PS	LTS/PS
<b>Transportation/Circulation</b>					
Traffic Impacts	LTS	NI	LTS	LTS	LTS
Transit Impacts	LTS	NI	LTS	LTS	LTS
Parking Impacts	LTS	NI	LTS	LTS	LTS
Pedestrian/Bicycle/Loading Impacts	LTS	NI	LTS	LTS	LTS
Construction Impacts	LTS	NI	LTS	LTS	LTS
<b>Topics covered in the Initial Study</b>	LTS	NI	LTS	LTS	LTS

LTS = Less Than Significant (Impacts)

NI = No Impact

PS = Potentially Significant (Impact)

SU = Significant and Unavoidable (Impact)

## **ALTERNATIVE A: NO PROJECT**

Under Alternative A, the No Project Alternative, the existing 45-foot-tall, three-story-over-basement residential building at 1831-1835 Broderick Street and the existing Drew School building in its current configuration on the site would remain (see Figure 15, page 81). The proposed three-story-over-basement, 40-foot-tall, approximately 15,604-square-foot addition to the Drew School would not be constructed. This alternative would not preclude future proposals for redevelopment of the project site.

If the No-Project Alternative were implemented, none of the proposed project's impacts discussed in Chapter III, Environmental Setting and Impacts, or in the Initial Study would occur, and none of the mitigation measures would be required.

The No Project Alternative would not meet any of the project sponsor's objectives listed in Chapter II, Section D, page 27, and the site would remain in residential use.

If the Planning Commission selected this alternative, and the project sponsor submits a different development proposal in the future, that proposal would be subject to a separate project-specific CEQA environmental review.

## **ALTERNATIVE B: PRESERVATION ALTERNATIVE**

Under Alternative B, the Preservation Alternative, the existing historic building on Lot 3 (1831-1835 Broderick Street) would be rehabilitated and reused as part of an expanded Drew School campus in compliance with the Secretary of the Interior's standards.

This alternative would not include the assembly room/theater, associated rehearsal space, tech gallery, scenery loft, and green room (staging/rehearsal room); it would only provide additional classroom space and restrooms. The social hall of the nearby Seventh Day Adventist Church (2889 California Street, at the southeast corner of Broderick and California Streets) would continue to be used for Drew School assembly functions, when available. The rehabilitated structure at 1831-1835 Broderick Street would provide additional classroom space and restrooms.

Compared to the proposed project, the Preservation Alternative would avoid the significant unavoidable project-specific impact and cumulative impact on historic resources caused by the proposed project's demolition of the existing 1831-1835 Broderick Street historic building on Lot 3, as well as avoiding the project's aesthetic impacts.



This alternative's archeology, construction air quality, and hazardous materials impacts would be the same or lower than those of the proposed project and would require implementation of the mitigation measures identified in Chapter IV, Mitigation and Improvement Measures, page 59, except Mitigation Measures 1, 2, and 3, Historical Architecture. This alternative would have impacts similar to or less than the proposed project's less-than-significant impacts identified in the Initial Study.

While assemblies could continue to be held across the street, this alternative would not meet the project sponsor's objectives to build a new assembly room/theater and rehearsal space as a focal point for the school. This alternative would meet the objective of the project sponsor to provide additional classrooms compatible with the neighborhood.

## **ALTERNATIVE C: PARTIAL PRESERVATION ALTERNATIVE**

Under Alternative C, the Partial Preservation Alternative would retain the first 15 feet of volume of the existing historic building on Lot 3 (1831-1835 Broderick Street). The remainder of the existing building and part of the existing courtyard, would be replaced with a new building containing an assembly room/theater and additional classroom space.

Retention of the first 15 feet of volume of the existing 1831-1835 Broderick Street building under the Partial Preservation Alternative would reduce, to some degree, but would not altogether avoid, the significant effect on historic resources that would occur with implementation of the proposed project, because a large portion of existing/intact historic building would be replaced with an incompatible structure.

This alternative's archeology, construction air quality, and hazardous materials impacts would be the same or less than those of the proposed project, and would require implementation of the mitigation measures identified in Chapter IV, Mitigation and Improvement Measures, page 67. This alternative would have impacts similar to or lesser than the proposed project's less-than-significant impacts in the Initial Study.

The Partial Preservation Alternative would meet some of the project sponsor's objectives, including: provide an assembly room/theater, rehearsal space, and additional classrooms; retain the existing neighborhood character of the area; expand the student population; and complete the project on schedule and within budget. This alternative would not provide a green "living wall" facing Broderick Street or allow flexibility of use. Under this alternative, the size of the existing courtyard would be reduced, and the configuration of windows may impair the project's ability to meet the daylighting requirements of LEED.

Alternative C, the Partial Preservation Alternative, would potentially reduce the impact to historic resources, but these impacts would remain significant and unavoidable.

## **ALTERNATIVE D: RESIDENTIAL GUIDELINES ALTERNATIVE**

Under Alternative D, the Residential Guidelines Alternative, the existing historic building on the southern portion of the site (1831-1835 Broderick Street) would be demolished, and an addition to the Drew School containing an assembly room/theater and additional classroom space would be constructed, in conformity with the Residential Design Guidelines.

The façade of the addition would be compatible with the scale and rhythm of the older residential buildings in the vicinity.

The Residential Guidelines Alternative would have a significant and unavoidable impact on historic architectural resources due to the demolition of the existing historic 1831-1835 Broderick Street building. However, the Residential Guidelines approach would be consistent with the treatment of new construction in residential districts generally.

Compared to the project, this alternative would reduce the aesthetic impacts to the potential historic district in the project area. This alternative's archeology, construction air quality, and hazardous materials impacts would be similar to those of the proposed project and would require implementation of the mitigation measures identified in Chapter IV, Mitigation and Improvement Measures, page 67. This alternative would have impacts similar to the proposed project's less-than-significant impacts in the Initial Study.

As presented, this alternative's façade would be less visually consistent with the existing Drew School than the proposed project. This alternative would meet the other objectives of the project sponsor to provide an assembly room/theater, rehearsal space, and additional classrooms for the Drew School; to design a building compatible with the existing neighborhood character of the area; to provide and enhance additional educational opportunities; and to complete the project on schedule and within budget.

Alternative D, the Residential Guidelines Alternative marginally would be the environmentally superior alternative over Alternative C.



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## II. PROJECT DESCRIPTION

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### A. PROJECT LOCATION

The project site is in San Francisco's Lower Pacific Heights neighborhood on the northwest corner of Broderick Street and California Streets (See Figure 1, page 14). The project site is located at 2901 California Street and 1831-1835 Broderick Street on Assessor's Block 1029, Lots 3 and 95. The irregularly-shaped site is on the block bounded by California Street (north), Broderick Street (east), Pine Street (south), and Baker Street (west). The project site is within the Residential, Mixed, Low Density (RM-1) zoning district and the 40-X height and bulk district.

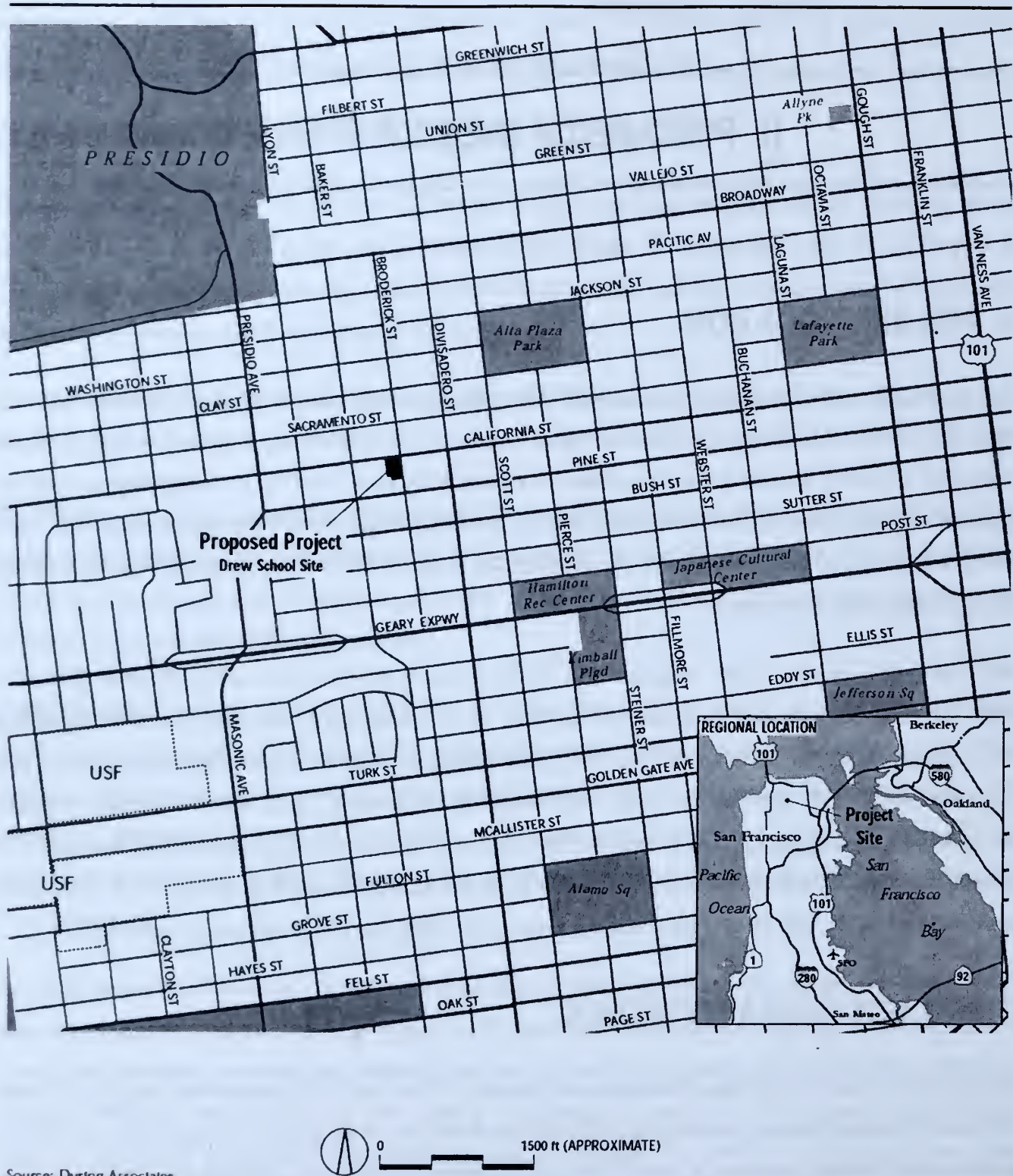
The project site consists of two adjacent lots: (1) the 2,269-square-foot (0.05 acre) 1831-1835 Broderick Street lot on the southern end (Assessor's Block 1029, Lot 3) containing a three-story, residential building (acquired by the school in 2004); and (2) the 15,732-square-foot (0.36 acre) 2901 California Street lot (Lot 95 of Assessor's Block 1029) on the north end containing the existing Drew School building, courtyard and basement parking garage. The project site and surrounding area generally slope gently downward to the south and east. The project site slopes downward to the south and east at an inclination of 20:1 to 40:1 (horizontal:vertical), with an elevation ranging from 167 to 170.5 feet (San Francisco City Datum).

### B. PROJECT CHARACTERISTICS

The proposed project would demolish the approximately 45-foot-tall,<sup>5</sup> 5,225-square-foot residential, three-story-over-basement existing building at 1831-1835 Broderick Street originally constructed in 1891 and is considered an historic resource. A three-story-over-basement, 40-foot-tall, approximately 15,604-square-foot addition to the Drew School would be constructed on the site and on part of the existing school courtyard. The addition would contain additional classrooms, assembly room/theater, rehearsal space, tech gallery, scenery loft, green room (staging/rehearsal room), restrooms, and circulation space (see

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<sup>5</sup> The existing 1831-1835 building has a gable roof. The difference between the top of the ridge and the eave is approximately 3'-9", with the mid-point of the slope at approximately 45'. The Planning Code uses the mid-point of a sloped roof to measure the height of buildings.



Source: Durning Associates  
11-29-07

Proposed Project Location Figure 1



Figures 2 to 11, pages 15 to 25). The existing 26,470-square-foot Drew School,<sup>6</sup> established in 1908 and moved to its current location in 1911, would contain a total of approximately 42,074 square feet after completion of the proposed addition. The existing 21-space basement/underground parking garage would not change. The existing enrollment of about 243 students and 52 full and part-time faculty would increase to a maximum of 280 students and three additional staff (an increase of about 15 percent).

The proposed addition would occupy Lot 3 and the southern portion of the courtyard above the parking level of the existing Drew School (see Figures 2 and 3, pages 15 and 17). The addition would have a green "living wall" covered with vegetation facing Broderick Street. The project would include a roof design that utilizes vegetation and highly reflective surfaces (see Figure 8, page 22). The project development team would apply for certification that the new facility meets Leadership in Energy and Environmental Design (LEED) Green Building Rating System criteria for New Construction (LEED NC). The design would also incorporate several strategies which are part of the pilot version of LEED for Schools, a new standard being developed by the US Green Building Council.

The basement level of the addition would have approximately 5,191 square feet that would contain two classrooms, a rehearsal space, restrooms, and circulation space. The ground level would have about 5,312 square feet that would contain an assembly room/theatre and a green room (staging/rehearsal room). The second level would contain approximately 2,359 square feet that includes the upper volume of the assembly/theatre, a tech gallery and classroom. The third level would have about 2,742 square feet that would contain the upper volume of the assembly space, a classroom, circulation space, and a scenery loft. There would be approximately 2,300 square feet of usable open space in the courtyard for students and employees. The entrance to the theater/assembly space would be off the courtyard. The main entrance to the school would continue to be on California Street. There would be an entrance to the basement level on Broderick Street.

There are three street trees along the Broderick Street frontage, and two street trees along the California Street frontage. One or more of the street trees along the Broderick Street frontage would be removed to facilitate construction and would be replaced after the addition is completed. Four evergreen elm trees in the courtyard level of the school, and thirteen white poplar trees at the edge of the courtyard would be removed and would not be replaced. No additional landscaping is planned.

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<sup>6</sup> The Conditional Use Authorization motion indicates that the existing school is 22,500 square feet, and does not include basement parking or building services.

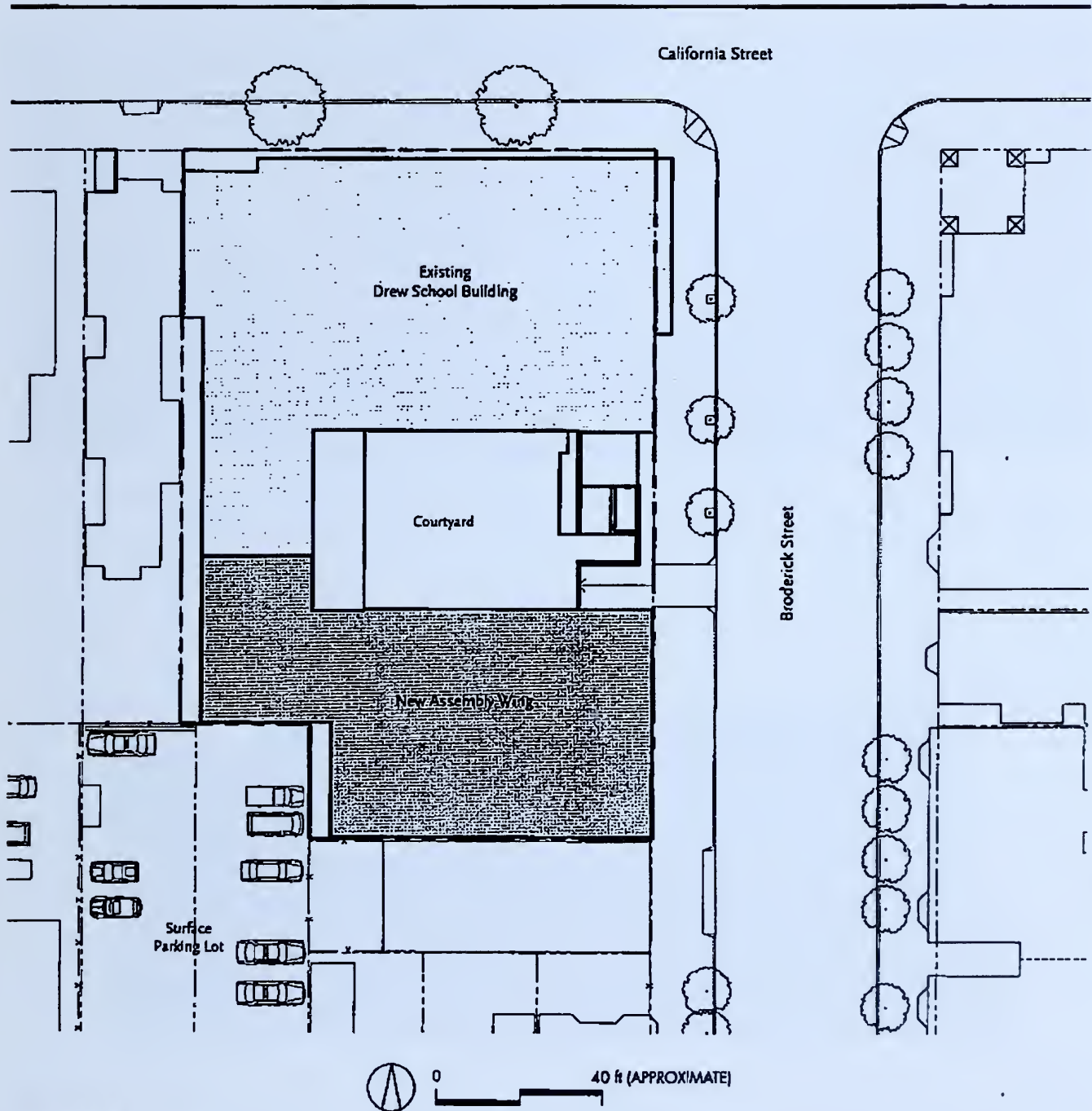




Source: Roma Design Group

2.20.08

Existing Site Plan Figure 2



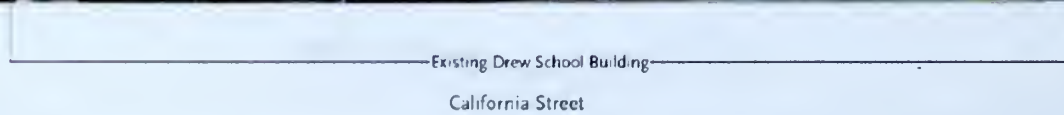
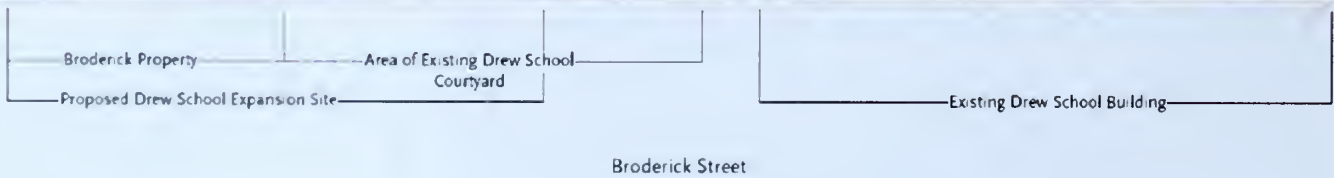
Source: Roma Design Group

1 31 06

Proposed Drew School Expansion Site Plan Figure 3



## II. PROJECT DESCRIPTION

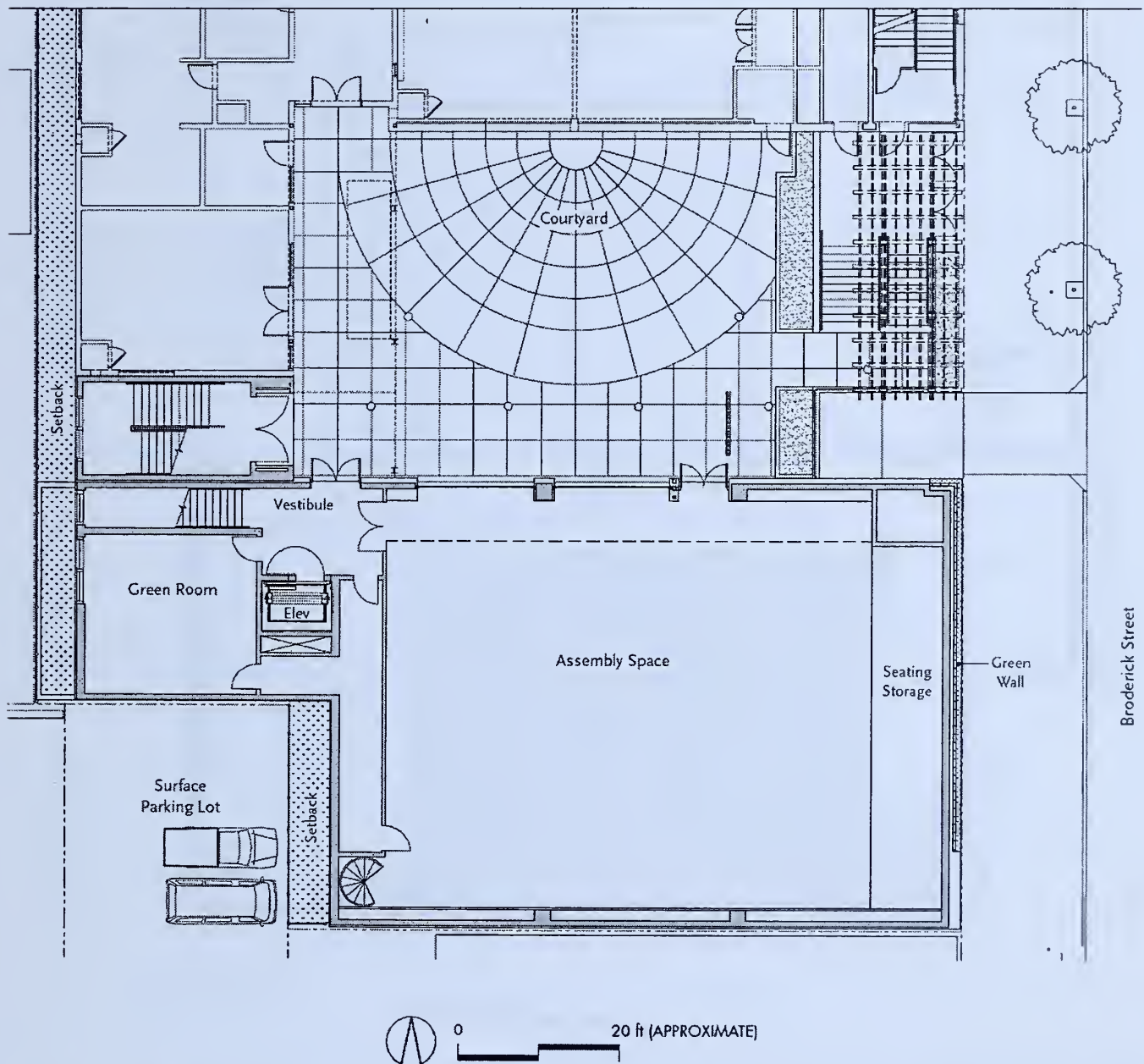


Source: Roma Design Group

5-4-000

Proposed Expansion Site and Existing Drew School Photos Figure 4

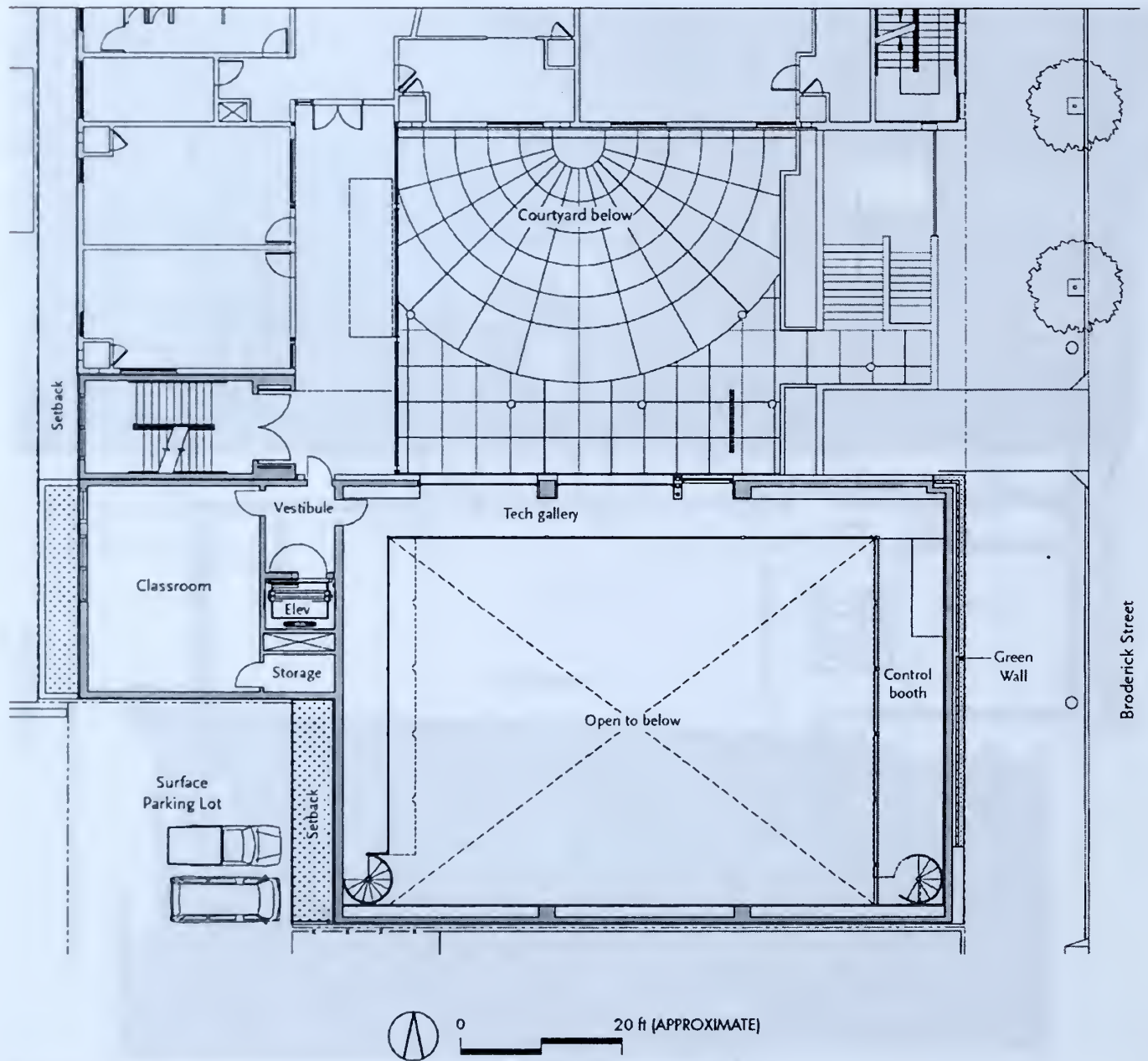




Source: Roma Design Group

2-1-08

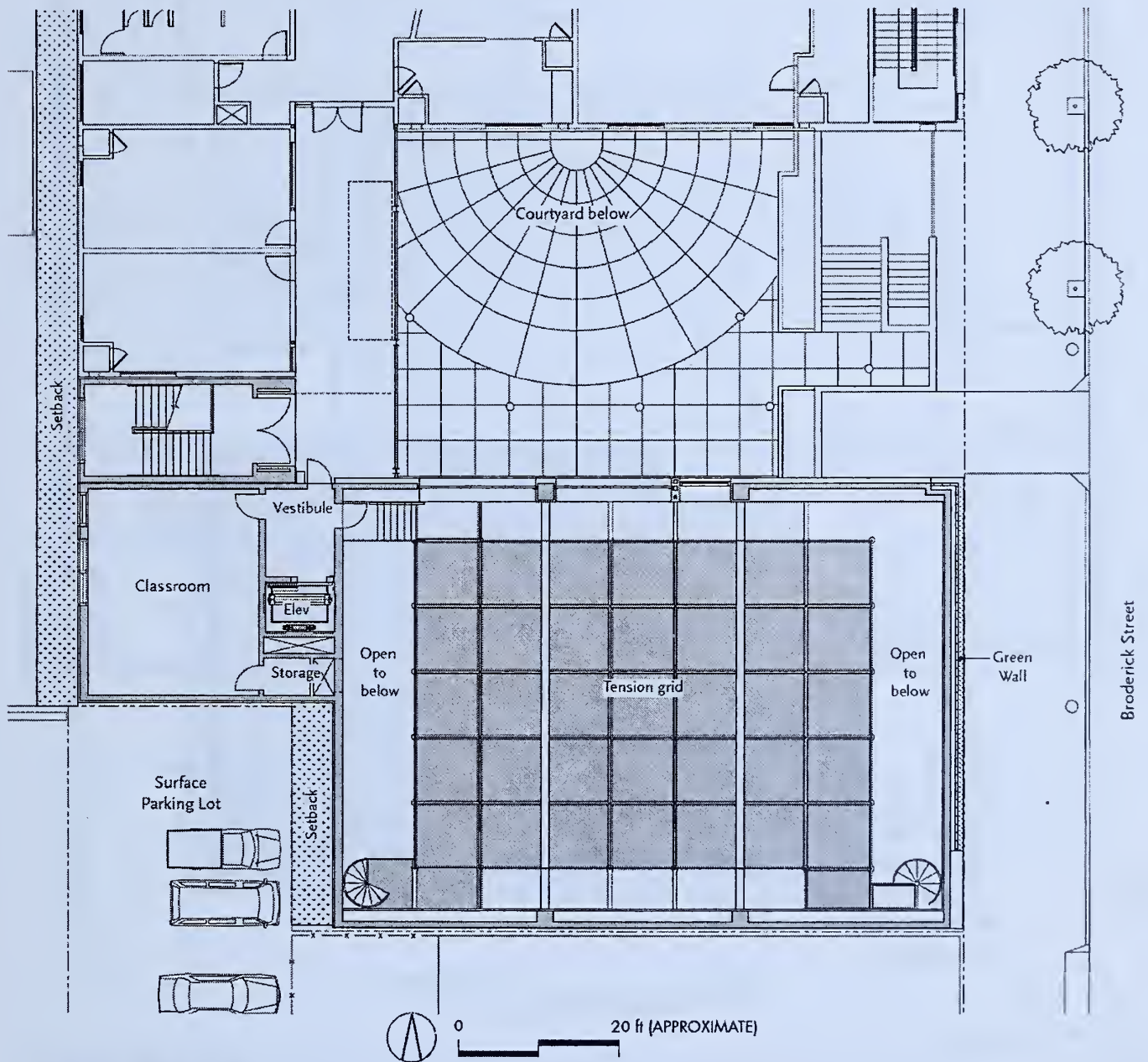
Proposed Drew School Expansion Courtyard Level Floor Plan Figure 5



Source: Roma Design Group

2.1.08

Proposed Drew School Expansion Second Floor Plan Figure 6

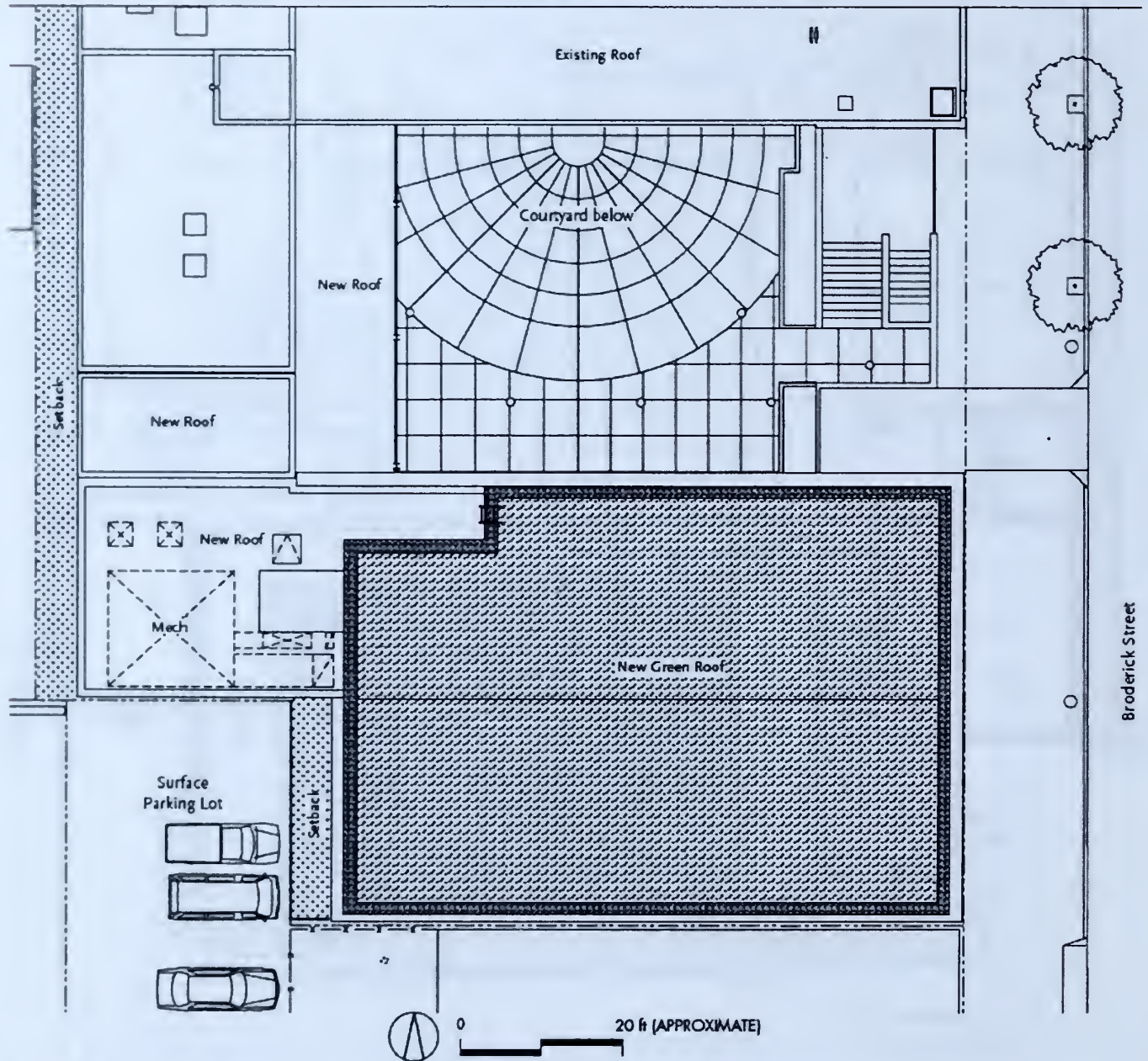


Source: Roma Design Group

2-1-08

Proposed Drew School Expansion Third Floor Plan Figure 7

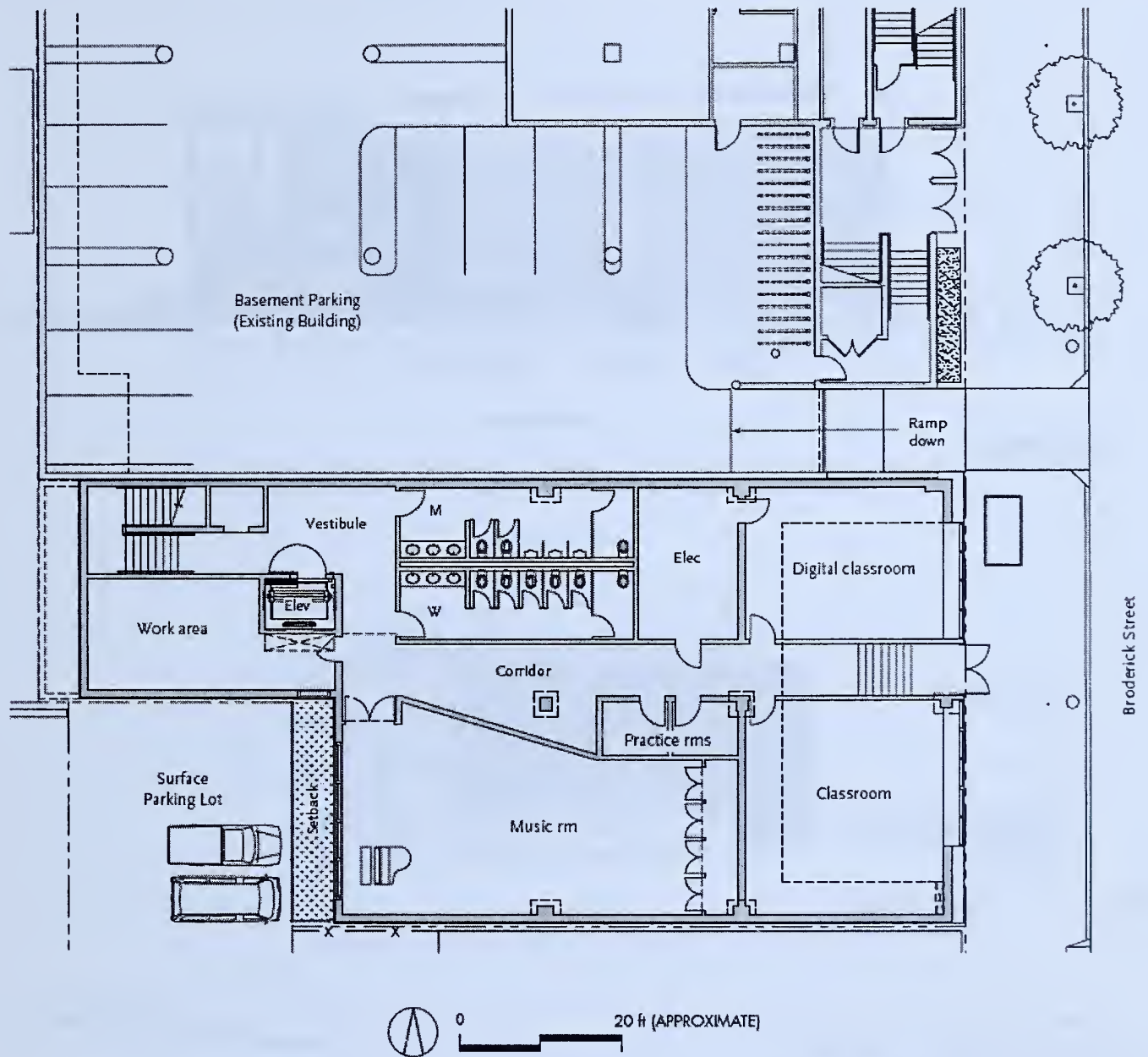




Source: Roma Design Group

2-1-08

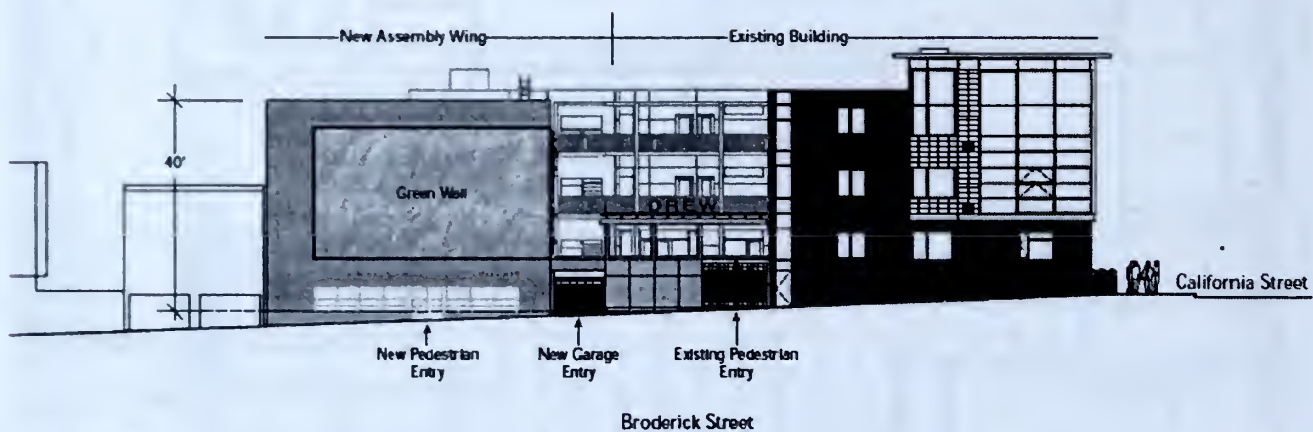
Proposed Drew School Expansion Green Roof Plan Figure 8



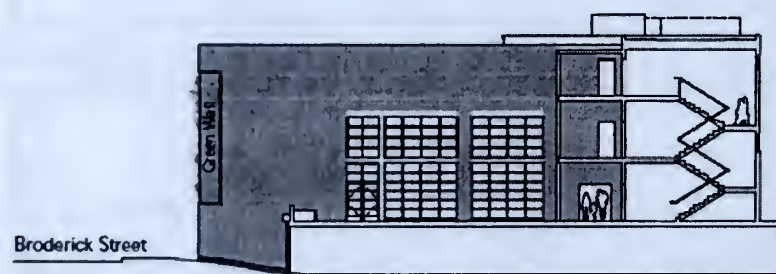
Source: Roma Design Group

1-29-08

Proposed Drew School Expansion Basement Floor Plan Figure 9



East Elevation



North Elevation

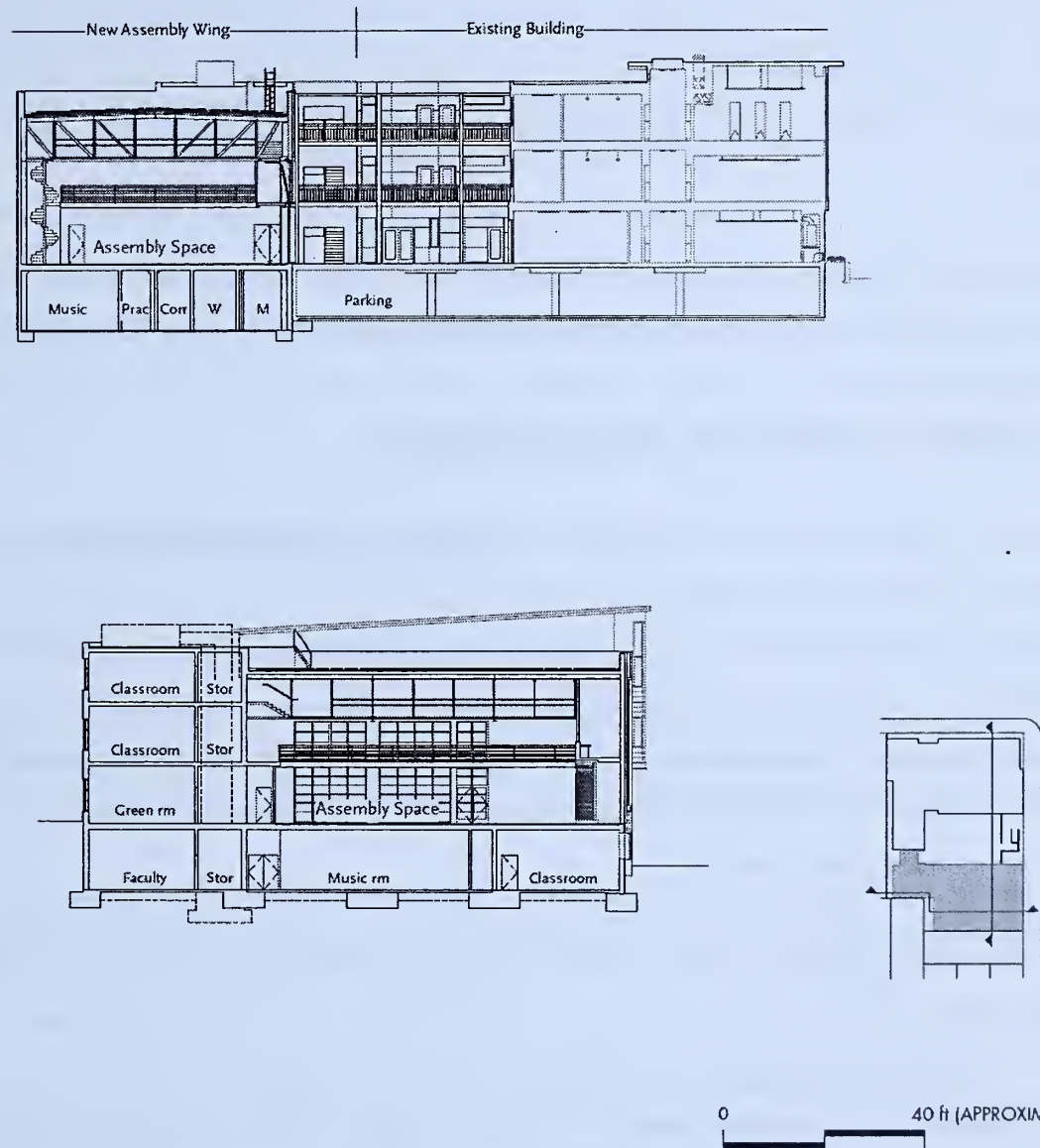
0 40 ft (APPROXIMATE)

Source: Roma Design Group

2.6.06

Proposed Drew School Expansion Project Elevations Figure 10





Source: Roma Design Group

9-19-08

Proposed Drew School Expansion Project Sections Figure 11

The proposed project would require demolition of a pre-1906 earthquake residential Victorian building, acquired by the school in 2004.<sup>7</sup> It contains three residential flats that will be vacated in June 2008.

The project's basement and foundation would require excavation to a depth of approximately 12 feet below the existing sidewalk. The basement foundation would be approximately two to three feet below the level of the existing garage. Approximately 29,000 cubic feet (1,074 cubic yards) of soil would be removed.

If approved, construction of the proposed project would occur over approximately 13 months, and the estimated construction cost of the proposed project would be approximately \$4.5 million.

## C. PROJECT APPROVAL REQUIREMENTS

The public comment period on this Draft EIR will be from October 8, 2008 to November 22, 2008 as noted on the cover of this report, including a public hearing before the Planning Commission on the Draft EIR. Following the public comment period, responses to written and oral comments will be prepared and published in a Comments and Responses document. The Planning Commission will consider this Draft EIR, together with the Comments and Responses document a noticed public meeting, and will certify them as the Final EIR if deemed adequate. No approvals or permits may be issued until the Planning Commission certifies the Final EIR.

Completion of the proposed project would require the following approval actions (*italic font signifies acting bodies*):

- Conditional Use authorization (*Planning Code* Section 303) for a school use in a RM-1 district (*Planning Code* Section 209.3(h)). This authorization would amend the 1999 Conditional Use authorization for the existing school and increase the enrollment from 250 to 280 students. *Planning Commission.*
- Variance (*Planning Code* Section 305) from the rear yard requirement to provide necessary assembly space in the new building. (*Planning Code* Section 134(a)(2)). *Zoning Administrator.*
- Mandatory Discretionary Review for demolition of a residential building on the project site. *Planning Commission.*
- Building and Demolition Permit approval. *Department of Building Inspection.*
- Parcel map merging Lot 3 and Lot 95. *Bureau of Streets and Mapping of the Department of Public Works.*
- Street and sidewalk permits. *Bureau of Streets and Mapping of the Department of Public Works.*
- Curb and/or road modifications (if any). *Department of Parking and Traffic.*

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<sup>7</sup> Charles Drew purchased the property in 1937 and sold it in 1953. Drew School repurchased it in 2004.

- LEED Certification. *U.S. Green Building Council.*

The 1999 Conditional Use authorization allowed Drew School to construct a new school building, to intensify the enrollment from 200 to 250; to provide a 21- to 23-space parking garage, and to create a passenger loading zone on Broderick Street.<sup>8</sup> All the conditions imposed by the Planning Commission in 1999 will remain in full force and effect. (The existing Conditions of Approval are reprinted in Appendix B.) If the Planning Commission approved the proposed project, the more stringent of the conditions of approval imposed by the 1999 Planning Commission Motion or the additional conditions of approval will prevail, except for the number of student body and construction of the assembly wing. The additional conditions of approval may include some or all of the mitigation and improvement measures identified in this EIR (see page 67).

## D. PROJECT SPONSOR'S OBJECTIVES

The project sponsor has the following objectives:

- To develop an approximately 15,600-square-foot addition to the existing Drew School building that would provide state-of-the-art space for an assembly room/theater, rehearsal space, and classrooms that is of a size sufficient to support Drew School's program in drama, music and the arts.
- To implement the school's phase II expansion program designed to create additional classrooms and an assembly/theater necessary to realize the long-held vision of making drama, music and the arts the major focus of the school's expanding curricula and education mission.
- To build a new wing that can accommodate multiple uses and that focuses on a shared courtyard connecting the two wings of the school, forming a cohesive educational environment.
- To enable the continuing expansion of the school's financial assistance program to further the ethnic and economic diversity of the student body by adding new classrooms to house an increased student population.
- To raise the environmental consciousness of the students, parents and others associated with the school by integrating green building design principles into the design of the proposed project to meet the standards for Gold certification by the Leadership in Energy and Environmental Design (LEED for Schools) rating system.
- To design a building that is compatible with the existing neighborhood character.
- Complete the project on schedule and within budget.

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<sup>8</sup> Other conditions included prevention of student loitering in residential areas, containment of noise and light on school premises, prevention of double parking, encouragement of use of public transit and alternative means of transportation, appointment of a community liaison officer, provision of a traffic control monitor, and limitation of special evening and weekend events to two a month.



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### III. ENVIRONMENTAL SETTING AND IMPACTS

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The project sponsor filed an application on January 18, 2007, for the environmental evaluation of the proposed Drew School Addition project. Based on the Initial Study published on March 8, 2008, the San Francisco Planning Department determined that an EIR is required. The Initial Study concluded that many of the physical environmental effects of the proposed project would be less than significant, or that mitigation measures agreed to by the project sponsor and required as a condition of project approval, would reduce them to less-than-significant levels (see Chapter IV: Mitigation and Improvement Measures and Appendix A: Initial Study). CEQA does not require further assessment of these less-than-significant environmental effects of the proposed project, including effects on land use, aesthetics, population and housing, archaeological and paleontological resources, transportation/circulation, noise, air quality, wind, shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazardous materials, mineral and energy resources, and agricultural resources. However, the Initial Study found potential project-specific effects and/or cumulative impacts related to historical architectural resources as potentially significant. Accordingly, the effects on historic architectural resources are analyzed in this EIR. While the Initial Study found that the proposed project would not cause potential significant environmental effects for aesthetics and transportation/circulation, and would not require further analysis of these topics, this EIR includes a discussion of aesthetics and transportation/circulation for informational purposes.

As required by CEQA, this EIR and the Initial Study assess construction, operational, and cumulative impacts. For example, the Initial Study (Appendix A, pages A-30 to A-41, and pages A-77 to A-79) discusses construction traffic effects, both project-specific and cumulative transportation impacts. The Initial Study (Appendix A, pages A-44 to A-48, and pages A-77 and A-78) addresses construction-related air emissions with associated mitigation measures.

## A. LAND USE

The Initial Study's assessment (see Appendix A) found that the proposed expansion of educational uses on the site would be a less-than-significant impact on land use. Therefore, this section discusses land use issues for informational purposes.

### SETTING

#### Land Use

The project site consists of two lots: the 2,269-square-foot (0.05 acre) 1831-1835 Broderick Street lot on the southern end (Assessor's Block 1029, Lot 3) that contains a three-story, residential building (acquired by the school in 2004); and the 15,732-square-foot (0.36 acre) 2901 California Street lot (Lot 95 of Assessor's Block 1029) on the north end that contains the existing Drew School building, courtyard and basement parking garage. The project is located in Lower Pacific Heights on the west side of Broderick Street, in the block bounded by Broderick, California, Baker, and Pine Streets.

South of Lot 3 are two three-story multi-family residential buildings (1825 Broderick Street and 1801 Broderick Street at the northwest corner of Broderick and Pine Streets).

Across the street to the east of the project site, on the southeast corner of Broderick and California Streets, is the three- to five-story Seventh-Day Adventist Church (2889 California Street) with an approximately 60-foot steeple. South of the church on the east side of Broderick Street are a two-story-over-basement two-unit residential building (1832-1834 Broderick Street) and a three-story multi-family residential building at the northeast corner of Broderick and Pine Streets (1816-1826 Broderick Street).

The project site vicinity (within one to two blocks) is a mixed-use area comprised of residential and non-residential land uses characterized primarily by residential uses with neighboring serving retail, restaurant, commercial, office, religious, educational, and parking uses. Non-residential uses are concentrated along California Street east of Broderick Street, with residential uses predominating elsewhere, including nearby Broderick and Pine Streets, and California Street west of Broderick Street. Most buildings are low (two to four stories) and, with the exception of the Drew School, date from the early twentieth century. In contrast to the buildings west of Broderick Street, most of the buildings east of Broderick Street have non-residential uses on the ground floor (retail, commercial, restaurant, office) with residential uses on the upper floors.



Broderick Street north of California Street and both sides of Pine Street to the east and west of Broderick Street are occupied by single- and multi-family residential buildings dating primarily from the early twentieth century. On the north side of Pine Street west of Broderick is a paved surface parking area, accessed from Pine Street, that extends northward to the southwest corner of the existing Drew School (Lot 95) and the western boundary of the 1831-1835 Broderick Street site (Lot 3). The school leases approximately 11 spaces on the lot from the Seventh Day Adventist Church. There is no direct access from the school grounds to the parking lot.

### San Francisco Planning Code

The zoning district of the project site is Residential, Mixed, Low Density (RM-1) and the surrounding area is a mixture of zoning districts, including RM-1 and Neighborhood Commercial Cluster (NC-1) to the northwest, Residential, Mixed, Moderate Density (RM-2) and Residential, House, Two-Family (RH-2) to the north; Small-Scale Neighborhood Commercial (NC-2) to the east; RH-2 to the southeast; RM-1 to the south, and RH-2 to the southwest and west. See Figure 12 on page 32 for a map of zoning districts in the vicinity. The project site is within a 40-X height and bulk district, as is the surrounding area.

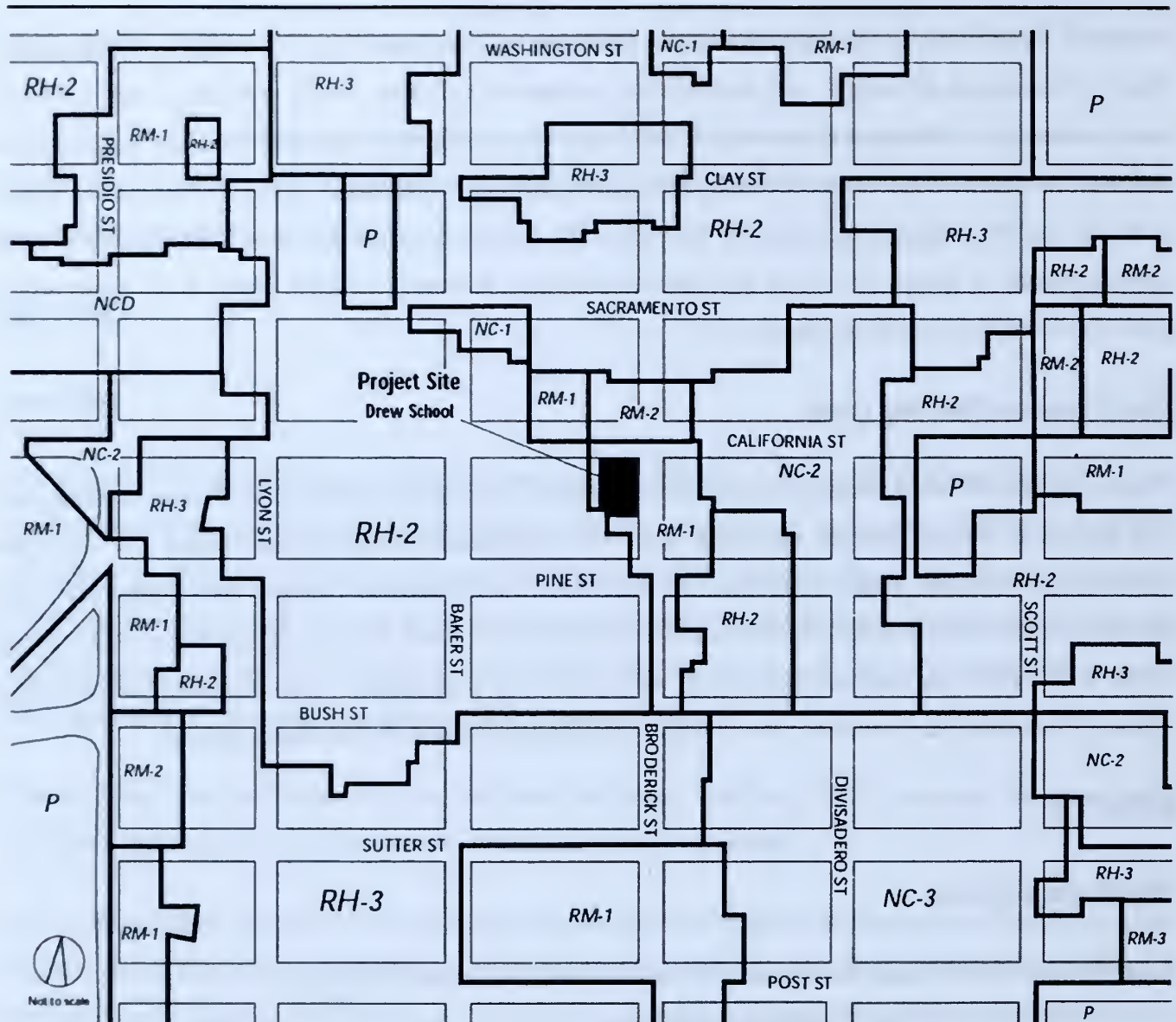
## IMPACTS

### Significance Criteria

A project would have a significant land use effect on the environment if it were to:

- Physically divide an established community.
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the *General Plan*, specific plans, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Have a substantial adverse impact on the existing character of the vicinity.

A conflict between a proposed project and a general plan policy does not necessarily indicate a significant effect on the environment under CEQA. The staff report for the Planning Commission will analyze the project's consistency with *General Plan* policies and zoning, and will discuss any exceptions requested or modifications required. As a result, the impact analysis below does not evaluate inconsistencies between



Source: San Francisco Planning Department, Durning Associates

2 7 08

Existing Zoning Map Figure 12

the proposed project and *General Plan* policies that do not relate to physical environmental impacts, although other sections of this EIR and the Initial Study analyze physical environmental impacts that could result from such conflicts.

## Impact Analysis

### LAND USE CHARACTER

The proposed project, which is an addition to the existing Drew School, would replace an existing three-story-over-basement residential building and a portion of the Drew School courtyard at the site with a three-story-over-basement expansion of the Drew School. With the proposed addition, Drew School seeks to increase enrollment by about 15 percent to 280 students. As part of the Drew School 1999 conditional use authorization, the enrollment was capped at 250 students. The project would extend an existing and more intensive institutional use into a residential neighborhood. However, the actual intensity of use with an addition of up to 30 students would be modest.

The school use would not be new. Drew School has been located at California and Broderick Streets for almost 100 years. Because of resident ownership on the balance of Broderick Street, further expansion by Drew School or another institution would be unlikely.

The proposed addition would be similar in scale and massing to the existing Drew School building on the project site. The school would introduce a "living wall" to the street, a non-traditional vertical landscape.

While the proposed project would expand the current educational use to an additional lot, extending the use down Broderick Street an additional 25 percent of the block-face, an expansion of that size would not be substantial in the context of the neighborhood setting, nor in degree of any adverse change to the surrounding neighborhood.

The impact of the expansion would be most pronounced for residents of the 1800 block of Broderick Street. As the institution of the Drew School has operated at the corner of Broderick and California continuously in the lifetime of residents, the use character of expansion would be generally consistent with the immediate setting. The impact of the expanded institutional use on the residential character of the neighborhood is primarily tied to its physical or visual expression, taken up in discussion in this EIR in the Aesthetics and Historic Resource sections, and would be most greatly felt on the immediate Broderick Street block. Although the residents of this block may experience this expansion of the existing land use as unwelcome, the actual increase in use by an additional 40 persons could not be seen as significant. The land use character of the west side of the 1800 block of Broderick would change to the primary presence of the Drew School.



The Department has received written comment letters expressing concern over the expansion of institutions in the area generally. In order to investigate this concern, the Department conducted a preliminary geographic information system screening analysis. The area reviewed was within the corridor area suggested by the resident: the California/Pine/Bush Street corridors between Presidio and Van Ness Avenue. It appears that within this area over 40% Conditional Use (CU) cases since 1987 involved changes of land use to institutional use. This appears to substantiate the observation of the letter. While this may be a relatively high proportion of a particular use change compared to CUs in the City generally, future conversions would be constrained by the price of property and resident-ownership. Additionally, the CU process includes discretionary consideration by the Planning Commission, at minimum a review and hearing process, so future such conversion proposals would have appropriate oversight.

The project seeks amendment of 1999 Conditions and their application to the 1831-1835 Lot, 30' in width. The project would not expect to result in additional institutional expansion on the block inasmuch as it complete plans for the Drew School. The proposed project would not change the area land uses or their intensity, or disrupt or divide an established neighborhood. The proposed project's impact on existing land use character would therefore, not be considered a significant impact.

#### **CONSISTENCY WITH SAN FRANCISCO PLANNING CODE**

The proposed project would be consistent with all relevant plans, planning codes, and zoning. The *Planning Code* allows for granting CU authorization to expand the existing Drew School educational use to a residential site and granting the zoning variance from the rear yard provision requirements of the RM-1 district that the proposed project would require for Lot 3. The purpose of the rear yard requirements is to provide mid-block open spaces in residential blocks. In order to provide the necessary assembly space for the school, the proposed project addition would change the existing building footprint on Lot 3 by expanding to approximately 8 ½ feet from the west property line and reducing the existing courtyard to the north. The project would include a connection from the existing school to the new assembly building that would be set back about five from the west property line (similar to the existing building). Although the project would not meet the *Planning Code* requirement for set back, there would still be open space similar to the existing conditions (see Figure 2, page 15).

#### **CONCLUSION**

The proposed project would expand the educational use and institutional character of Drew School along Broderick Street, but would not physically divide an established community, nor conflict with adopted land use plans, nor substantially and adversely alter the land use character of the vicinity. Therefore, the proposed project's land use impacts would be less than significant.

Cumulative impacts of the land use change would be unlikely to affect the rest of the block as the addition completes Drew's mapped build-out plans and established residential and commercial uses would be unlikely institutional property acquisitions. However, in the interest of responding to concerns expressed by residents in the area, the Planning Department, through Improvement Measure 1, would continue to develop information on cumulative residential conversions to other uses. Project incremental contributions to any area-wide cumulative impacts would not be cumulatively considerable in this instance for the reasons above and because such land use changes are regulated through the existing conditional use process.

## B. AESTHETICS

This section discusses potential visual impacts of the proposed project. The Initial Study found that the demolition of the existing 45-foot-tall, three-story-over-basement residential building at 1831-1835 Broderick Street and construction of a three-story-over-basement, 40-foot-tall addition to the existing Drew School building would not:

- Have a substantial demonstrable negative effect on a scenic vista or the existing visual character of the project vicinity,
- Damage scenic resources,
- Degrade private views, or
- Create a new source of obtrusive light and glare.

This section summarizes the effects of the proposed project on the visual character of the project site and its surroundings for informational purposes.

## SETTING

San Francisco has many scenic views from its hilltops and from locations near the Pacific Coast or San Francisco Bay. The height and location of buildings, structures, and other physical elements define view corridors by directing lines of sight along street walls and down streets. Some of San Francisco's view corridors, particularly those down its numerous hills, yield spectacular views of San Francisco Bay. The *General Plan* identifies the importance of recognizing and protecting major views in the City, with particular attention to views of open space and water.<sup>9</sup>

Scenic vistas and views are limited in the project vicinity due to the generally flat topography and to the intervening buildings of surrounding urban development. The nearest public open spaces under the jurisdiction of the Recreation and Park Department are:

- Alta Plaza Park, located approximately four blocks northeast of the project site in the area bounded by Scott, Jackson, Steiner, and Clay, Streets;
- Clay Street Mini-Park, located approximately four blocks northwest of the project site on the south side of Clay Street between Baker and Lyon Streets;
- Presidio Library Mini-Park, located approximately three blocks northwest of the project site on the north side of Sacramento Street between Baker and Lyon Streets; and
- Bush and Broderick Mini-Park, located approximately two blocks southwest of the project site on the south side of Bush Street between Broderick and Baker Streets.

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<sup>9</sup> *San Francisco General Plan*, Urban Design Element, Objective 1, Policy 1.1.



The site is not visible from these parks due to the topography, the presence of intervening buildings, and the distance between the site and this open space,. The site is not near the Pacific Coast or the San Francisco Bay.

Scenic resources on a project site could include trees, rock outcroppings, and other features of the built or natural environment that contribute to a scenic public setting. In the case of the proposed project, the existing buildings and courtyard cover the entire site. The only landscape features on the project site are three street trees along the Broderick Street frontage, two street trees along the California Street frontage, four evergreen elm trees in the courtyard level of the school, and thirteen white poplar trees at the edge of the courtyard.

The visual character of the project site and vicinity is an urbanized area and moderately dense. The buildings vary in architectural styles, sizes, and ages. The predominant style is Stick with Italianate and Edwardian structures interspersed throughout the area.<sup>10</sup> The majority of buildings range from two to four stories tall, and the tallest buildings in the site vicinity are a three- to five-story Seventh Day Adventist Church (2889 California Street), with an approximately 60-foot steeple, across the site on Broderick Street and two seven-story multi-family residential buildings on the northeast corner of California and Broderick Streets and the southeast corner of California and Baker Streets (2890 California Street and 2999 California Street, respectively).

The existing Drew School and the 1831-1835 Broderick Street building have exterior lighting similar to that of other commercial and residential uses in the vicinity. Commercial storefronts, signs, streetlights, and residences all contribute to nighttime light conditions in the area.

Pedestrians and drivers see limited views of the project site from nearby portions of Broderick and California Streets. Intervening buildings screen views of the project site from more distant street-level vantage points.

## IMPACTS

### Significance Criteria

A project would have a significant aesthetic effect if it would:

- Substantially and adversely degrade a scenic vista;

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<sup>10</sup> **Stick Architecture Style**--Typical characteristics include gabled, steeply pitched roofs with overhangs; wooden shingles covering the exterior walls and roof; horizontal, vertical, or diagonal boards--the "sticks" from which it takes its name--that decorate the cladding; and porches.

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment, which contribute to a scenic public setting;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties.

### Impact Analysis

This analysis considers the proposed project in the context of the overall visual character of the neighborhood. Architecture and design considerations, which are subjective, are not the focus of the analysis of aesthetic impacts in environmental review. The Planning Department and the Planning Commission will address the building architecture and design as part of project review and approval, separate from the environmental review. The proposed project's final design would be determined at that time.

Due to the topography, the presence of intervening buildings, and the distance between the project site and the public parks, the project would not be visible from such public parks and, thus, would not block vistas from them. The proposed project, at 40 feet in height, would be visible from nearby street segments, but would not obstruct public scenic views of the parks described above (Alta Plaza Park, Clay Street Mini-Park, Presidio Library Mini-Park, and Bush and Broderick Mini-Park). The project's impact on scenic vistas and views, both project-specific and cumulative, would be less than significant.

The proposed project would require removal of one or more of the three street trees along the Broderick Street frontage to facilitate construction and would replace them. The two street trees along the California Street frontage would be retained. The proposed project would require removal of the four evergreen elm trees in the courtyard level of the school and the thirteen white poplar trees at the edge of the courtyard. No additional landscaping is planned. The San Francisco Board of Supervisors recently adopted legislation that amended the City's Urban Forestry Ordinance, Public Works Code Sections 801 et. seq., to require a permit from the DPW to remove any protected trees. Protected trees include landmark trees, significant trees, or street trees located on private or public property anywhere within the territorial limits of the City and County of San Francisco. None of the removed trees is a landmark tree or a significant tree (with a canopy in excess of 15 feet or a trunk diameter in excess of 12 inches). No other scenic resources exist on the site. Thus, the project would not substantially damage scenic resources, and the impact, both project-specific and cumulative, would be less than significant.

With respect to private views, the existing Drew School and the Seventh Day Adventist Church on the southeast corner of Broderick and California Streets already limit private views past the block of Broderick south of California Street. The proposed addition would be similar in height to the existing



1831-1835 Broderick Street building, although about twice as wide. Some nearby residents may consider changed private views with the project to be an undesirable change. However, impairment of private views is normally not a significant environmental impact, either project-specific or cumulative.

The proposed school addition would be architecturally consistent with the existing Drew School building and its California Street frontage. The existing Drew School and the proposed project would frame the courtyard fronting on Broderick Street. The massing of the addition would be similar to the existing school building on the Broderick Street side. A unique feature of the building would be a garden or "living wall" to promote environmental consciousness on the exterior façade on Broderick Street wrapping around the corner on the north side (see Figure 10, page 24). The effect of vegetation would soften the mass and material of the addition.

The proposed project would be 40 feet tall, similar in height to a number of the buildings in the immediate vicinity. The tallest building in the immediate vicinity is the seven-story multi-family residential building on the northeast corner of California and Broderick Streets. It would be lower than the existing building on the site, one story higher than the adjacent existing residence on the west side of Broderick, and about the same height as the existing buildings on the east side of Broderick Street. The proposed project would increase the prominence of the school along Broderick. It would be consistent with the visual character the Drew School has introduced into the neighborhood, but might not be compatible with the potential historic district if such a district were to be surveyed and formally designated, as discussed in this EIR on page 41.

Design and aesthetics are, by definition, subjective and open to interpretation by decision-makers and members of the public. A proposed project would have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change. The proposed project would not cause such a change. While expanding the institutional presence on the immediate setting, the proposed project would not add a new or visually inconsistent presence to the area. For these reasons, the proposed project would not cause a substantial and demonstrable negative change or disruption to the existing visual character of the project vicinity, either project-specific or cumulative.

The lighting of the proposed addition would be similar to that of the existing school building. The Broderick Street frontage of this addition would not have glazing above the ground floor. The addition's courtyard façade would face north and would have a bank of multistory windows at the assembly entrance (approximately 25 feet set back from the street). The proposed project would comply with Planning Commission Resolution No. 9212, which prohibits the use of mirrored or reflective glass, and the exterior lighting of the addition would be similar to the exterior lighting of the existing school. For these reasons, the proposed project would not generate obtrusive light or glare that would substantially



affect the occupants of the other properties, and project impacts, both project-specific and cumulative, would be less than significant.

As discussed above, the proposed project would not have a substantial and demonstrable negative effect on a scenic vista, damage scenic resources, degrade the site's or surrounding area's visual character, or create a new source of obtrusive light and glare. The Department has received comments from residents objecting to the visual impact of the addition. The change to the existing environment, while making the school more prominent, would not cause a "substantial and demonstrable negative change" pursuant to CEQA. The proposed project would therefore have a less-than-significant aesthetic impact, both project-specific and cumulative.

## C. HISTORICAL ARCHITECTURAL RESOURCES

The Initial Study (see Appendix A) found that the residential building (1831-1835 Broderick Street) on the project site may be a contributor to a potential historic district and determined that further evaluation in the EIR would be necessary.

This section, therefore, evaluates the potential impacts on historical architectural resources that could result from the proposed project. Information on the history, architecture, and significance of the existing building on the project site, constructed in 1891, is from evaluations conducted by the San Francisco Planning Department's Preservation Specialist Staff and architectural historians Tim Kelly Consulting.<sup>11,12</sup>

### SETTING

#### The Western Addition

The project site is located in the Western Addition survey area, an area that was outside the San Francisco city limits until 1855. From 1855 until the passage of the Outside Lands legislation in 1866, land title ownership was disputed in the area, deterring development until the 1870s. Original incorporating legislation extended the street grid of the Vioget and O'Farrell surveys of 1839 and 1847 respectively, characterized by the larger block sizes currently exemplified by South of Market blocks. In response to development pressure, block size was reduced.

Public transportation was and is essential to residential development. The first public transit serving the Western Addition was in the form of horse drawn cars in the 1860s. By the late 1870s, the California Street cable car line extended to within one-half block of the project site. The cable car line and other successive electric streetcar lines further spurred residential development of the area between 1870 and 1906. Major east-west thoroughfares also contributed to residential development.

Small builders and individual homeowners were mainly responsible for the development of elaborate Victorian architectural styles which characterized the Western Addition, and which characterize the post-

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<sup>11</sup> Tara Sullivan-Lenane, Planning Department Preservation Staff, *2901 California Street aka 1831-1835 Broderick St. Historic Resource Evaluation Response* (Planning Department HRER), August 23, 2007. This document is part of project file 2007.0128E and available for public review by appointment at the Planning Department, 1650 Mission Street, Suite 400, San Francisco.

<sup>12</sup> Tim Kelly Consulting, *Historical Evaluation, 1831-1835 Broderick Street, San Francisco California* (Kelly Report), Revised April 2007. This document is part of project file 2007.0128E and available for public review by appointment at the Planning Department, 1650 Mission Street, Suite 400, San Francisco.



card idea of San Francisco today. The area contains many examples of Italianate, Stick and Queen Anne structures, as well as Edwardian era buildings and some later styles.

Adjacent to the south on Broderick are two-story apartment/condominium buildings constructed in the 1960s and 1970s. Across the street are two- and three-story residential buildings dating from 1910 to 1917 and the Seventh Day Adventist Church on the southeast corner of California and Broderick, built in 1892.

### **Potential Historic District**

The project vicinity contains a high concentration of buildings constructed from approximately the early 1880s through the early 1900s when residential housing was developed in the area. Consequently, there is considerable harmony among the houses and flats in the neighborhood. The building styles vary but the Stick style predominates with several late Italianate and Edwardian buildings interspersed throughout the neighborhood. Most building details are intact; while there have been some alterations to buildings, the majority still possess the character-defining features of basic form, footprint, fenestration pattern, and ornamentation from when they were originally constructed. The project block and the surrounding blocks contain a high concentration of buildings that are listed in both *Here Today* and in the 1976 Citywide Architectural Survey. The area is an excellent example of a residential area expressed in well-designed and highly articulated residential properties from this period of San Francisco's history. The neighborhood has an extremely high degree of integrity in design, material, setting, and feeling. Thus, a potential historic district may exist in the area, based on shared character-defining architectural features.

### **History of the 1831-1835 Broderick Street Building <sup>13,14</sup>**

The 1831-1835 Broderick Street building was constructed in late 1891. The original owner/builder was Alexander Gibbons, a tailor who lived at 1805 Broderick Street. Gibbons and his heirs owned the building until 1937, but never lived in it. In 1937, the building became the property of John S. Drew, founder of the Drew Preparatory School. The school, founded in 1908, moved to its current location at the southwest corner of Broderick and California in 1911. The Drew family held the property until 1953. It was not used as part of the school operations, nor as a residence for the Drew family. In 1953, John Drew sold the property to Lewis and Rose Session. Mr. Session, a crane operator at Bethlehem Steel Shipyard, sold the building to the Cotter Realty Company in 1955, which continued to rent the flats to until 2004. Drew School purchased the 1831-1835 Broderick Street property in 2004.

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<sup>13</sup> Kelly Report, pages 3-4.

<sup>14</sup> Planning Department HRER, page 2.



The current Drew School facility, which received design awards after its construction in 2001, replaced three buildings on the site: the main building at the corner, which housed the school since 1911, and two ancillary classroom buildings including a non-historic three-story building at the lot line of 1831-1835 Broderick.

## Building Design

The three-story over a partially raised basement building with three flats at 1831-1835 Broderick Street is of wood frame construction (see Figure 13, page 44). The architectural style of the building is Stick Eastlake Victorian, with a front gabled roof behind a gabled parapet. Three entrance doors are in a recessed entrance porch accessed from sidewalk level by wooden steps at the right of the street elevation. At the left is another staircase leading down to a basement entrance. Cladding is horizontal rustic redwood siding, shingles, and plywood with a brick veneer plinth.

The façade is composed with two vertical bays. At the first floor level, the left side contains a pair of double-hung wooden sash windows with segmented arch tops. An arched wooden grill supported by slender balusters framed the entrance porch to the right. Above the first floor, continuous two story projecting bays contain paired double-hung wooden sash windows with segmented arch tops. Each projecting bay also contains narrow side double-hung windows with segmented arch tops.

A bracketed cornice projects from near the top of the parapet with a frieze of diamond and fish scale shingles below. Shallow molded window hoods with brackets surmount each pair of windows as well as the narrow side windows. Each window also has a shallow sill.

Records show that the front façade underwent several alterations. A 1939 permit in the files of the Department of Building Inspection described the scope of work of that permit as "Re-sid(ing) front of building with white PABCO asbestos & cement siding, remodel windows using 1-½" rabbitted moldings; rip & strip back fancy work;" thus, the original façade was completely removed in or about 1939. No permit exists for the removal of the 1939 shingles and construction of the current façade; however, visual examination suggests it was removed in the 1970s or 80s.

Façade ornamentation and some cladding appears to have been reconstructed in recent times. The bottom of the bay windows are constructed of plywood. The cornice, window hoods, and sills are also modern in origin and are much shallower than historic Victorian fabric. Simulated panels beneath the windows are created with moldings applied to the flush plywood siding, as are the pilasters at the entrance steps. Brackets at the cornice and window hoods and the balusters supporting the wooden porch grill also





Source: Tim Kelley Consulting  
9-19-06

View of 1831–1835 Broderick Street Figure 13

appear to be stock modern elements. The ornament of the decorative recessed entry and door paneling is original.

### **The Architect<sup>15</sup>**

Michael J. Welsh designed the 1831-1835 Broderick Street building. Michael was the older brother of Thomas J. Welsh, a prolific and well-known architect in San Francisco in the late nineteenth century. In addition to designing the original St. Mary's Cathedral and many other churches and religious structures in the Bay area, Thomas J. Welsh designed dozens of residential properties throughout the City. Michael J. Welsh apprenticed at his brother's firm and the two collaborated on several buildings together. Michael J. Welsh eventually started his own practice; and is known to have designed more than 100 buildings throughout San Francisco. The majority of these buildings are located in the southeast part of the city, but there are also many buildings concentrated in the Haight-Ashbury and Lower Pacific Heights neighborhoods. Michael J. Welsh is an architect who made a significant contribution to the built environment in San Francisco.

### **Policy and Regulatory Framework**

CEQA Section 21084.1 states

"a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."

Evaluation of the potential for proposed projects to impact "historical resources" is a two-step process. The first step is to determine whether the property is a "historical resource" as defined in Section 15064.5(a)(3) of the state CEQA Guidelines, and, if it is a "historical resource." The second step is to evaluate whether the action or project proposed by the sponsor would cause a "substantial adverse change" to the "historical resource."<sup>16</sup> As discussed in detail below, the properties considered by the Planning Department to be historical resources are:

- Properties listed in or determined to be eligible for listing in the California Register (including National Register-listed or eligible properties);
- Properties listed in Planning Code Articles 10 and 11; and
- Properties listed as National or California Register-eligible in specific local surveys (such as Dogpatch Survey and North Beach Survey) adopted by the Board of Supervisors or Planning Commission.

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<sup>15</sup> Planning Department HRER, op cit.

<sup>16</sup> San Francisco Planning Department, Preservation Bulletin No. 16, "CEQA Review Procedures for Historic Resources," October 2004.



Other potential historic resources generally require further review prior to confirming their status. In some cases, this further research will result in a property not previously identified as an historical resource being determined to be an historical resource for CEQA purposes. As stated in Section 15064.5(a)(4) of the state CEQA Guidelines:

"The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources . . . or identified in an historical resources survey . . . does not preclude a lead agency from determining that the resource may be an historical resource . . ."

The 1831-1835 Broderick Street building had not been evaluated through the use of the National Register of Historic Places or California Register of Historical Resources criteria prior to this review. The 1831-1835 Broderick Street building is not listed in Articles 10 or 11 of the *Planning Code*, the *Here Today* survey, the *San Francisco Architectural Heritage Survey*, or the *1976 Architectural Quality Survey*.

#### **NATIONAL REGISTER OF HISTORIC PLACES/CALIFORNIA REGISTER OF HISTORICAL RESOURCES**

The National Register of Historic Places (National Register) is the official U.S. government list of properties that have architectural, historical, or cultural significance at the national, state, or local level. The California Register of Historical Resources (California Register) is an inventory of significant architectural, archeological, and historical resources in the State of California. State Historical Landmarks and National Register-eligible properties are automatically listed on the California Register.

Resources eligible for listing in the California Register of Historical Resources include buildings, structures, objects, or historic districts that retain historic integrity and are historically significant at the local, state, or national level under one or more of the following criteria:

**Criterion A (Event):** It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or

**Criterion B (Person):** It is associated with the lives of persons important to local, California, or national history; or

**Criterion C (Architecture):** It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or

**Criterion D (Informational Potential):** It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state, or the nation.

In addition to having significance, resources must have "integrity" for the period of significance. Integrity is the authenticity of an historical resource's physical identity as evidenced by survival of characteristics

or historic fabric that existed during the resource's period of significance. Simply put, resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A specific discussion of the existing building, California Register criteria, and integrity is contained below.

### **Evaluation of the 1831-1835 Broderick Street Building**

The record supports the determination that the 1831-1835 Broderick Street building individually would not be considered an historical resource. However, as discussed below, the 1831-1835 Broderick Street building appears to be eligible for listing in the California Register as a contributor to a potential historic district significant under Criterion "C" (Architecture).

#### **CALIFORNIA REGISTER CRITERIA <sup>17,18</sup>**

The 1831-1835 Broderick Street building is part of the residential development of the Outside Lands of San Francisco after 1870. Although part of this local pattern, there is no evidence to indicate this building is associated with any event that has made a significant contribution to the broad pattern of California's or San Francisco's history or cultural heritage. Thus, the building is not historically significant under Criterion "A" (Events).

The original owner of the building, Alexander Gibbons, was a tailor who lived at 1805 Broderick with no known important historical associations. John S. Drew, a prominent educator and founder of the Drew Preparatory School, acquired the building in 1937. However, this building's association with Mr. Drew does not appear to be strong enough to establish historical significance. Although Drew owned the building for sixteen years he held it as a rental property while the school operated at the corner. It was not intrinsically involved in his educational work, the basis of his personal significance, and, therefore, is not historically significant under Criterion "B" (Persons).

Michael J. Welsh, the architect of the building, was a well-known professional of his day and a prolific contributor to San Francisco's built environment. In its original state, the 1831-1835 Broderick Street building may have individually embodied the distinctive characteristics of its type, period, or region as a San Francisco Victorian Stick Eastlake set of flats. Because the building is not an excellent or outstanding example of Stick-style architecture, because it does not retain sufficient integrity, it would not be considered eligible to be individually listed under Criterion "C" (Architecture). Integrity is determined by seven characteristics: location, design, setting, materials, workmanship, feeling, and association. Removal

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<sup>17</sup> Kelly Report, op cit.

<sup>18</sup> Planning Department HRER, op cit.



of the original façade elements resulted in a loss of integrity of materials and workmanship. The later introduction of new façade elements, even if intended to simulate the original, does not restore that integrity.

The definition of "Master" Architect or Builder is generally reserved for those of recognized greatness in their field and noted in professional literature. Whether or not Michael J. Welch, lacking mention in professional literature during his active period (1886-1914) or since, would be a master, the loss of integrity discussed above negates the potential significance of the building as an example of his masterwork. Thus, the building as an individual structure cannot be seen as historically significant under Criterion "C" (design/construction).

1831-1835 Broderick Street retains a moderate degree of contextual integrity as a representative building type even though it has undergone several alterations during its lifetime. It retains the majority of the features that illustrate its style in terms of massing, spatial relationships, proportion, door and window pattern, and material texture. The building features typical Stick style characteristics of the era such as the pair of two-story bay windows, bracketed cornice, segmented-headed windows with surrounds, recessed entrance doors and areaway, and details such as arched lattice decoration and corner boards. The building reads as a late-19<sup>th</sup> Century Stick style residential building and shares similar characteristics of similar buildings in the neighborhood. Alteration of detail has not degraded the integrity of the building enough that it does not convey its overall original form and type.

Although 1831-1835 Broderick Street building, as an individual structure, is not eligible for listing, it appears to be eligible for the California Register as a contributor to a potential historic district under Criterion "C" (Architecture).

#### **CHARACTER DEFINING FEATURES**

As discussed in Potential Historic District, above, the project vicinity is an excellent example of a cohesive residential area expressed in well-designed and highly articulated residential properties from the 1870s to early 1990s period of San Francisco's history. A potential historic district may exist in the area, based on shared character-defining architectural features of the Victorian styles of the Western Addition. The 1831-1835 Broderick Street building retains sufficient integrity to convey its significance because it retains the majority of the features that illustrate its style in terms of massing, spatial relationships, proportion, pattern of windows and doors, and texture of materials, and because it was constructed in 1891 during the period of significance.

Original historical building fabric is found only in the paneled surfaces of the recessed entrance porch, the glazed entrance doors, and the arch topped wooden sash. While original Stick style ornament has



been replaced, as noted, the building still features a pair of two-story bay windows, bracketed cornice, and segmented-headed windows with surrounds.

The contextual integrity of the building still remains in relation to the shared architectural characteristics of a potential historic district. The building reads as a late-nineteenth century Stick style residential building and shares similar characteristics of similar buildings in the neighborhood. The high concentration of neighborhood examples of residential development from this period of San Francisco's history, highly articulated buildings with an extremely high degree of integrity, indicates the existence of a potential historic district. At minimum, the blocks between California and Broderick to Post and Lyon, inclusive of the project block, would merit survey because of the near absence of post-1913 structures in these blocks. However, a number of examples documented in Here Today and the 1976 Survey are found along the Pine Street corridor and other areas of lower Pacific Heights. More information would be needed to delineate the boundaries of an eligible district.

In sum, the 1831-1835 Broderick Street building retains integrity of location, design, setting, feeling, and association relative to this potential district. Therefore, as a contributor to this potential district, 1831-1835 Broderick Street would be eligible for the California Register under Criterion "C" (architecture) and an historical resource under CEQA.

For a property to be eligible for individual listing under Criterion "D" (archeological information potential), it must be likely to yield archeological information. As explained in the Initial Study (see Appendix A), the site is not expected to be sensitive. Archeological impacts of the proposed project would be reduced to a less-than-significant level with implementation of Mitigation Measure 4, page 69.

## **IMPACTS**

### **Significance Criteria**

CEQA Guideline Section 15064.5 defines a "substantial adverse change" as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." A project would have a significant effect if it would substantially disrupt or cause a substantial adverse change in the significance of an historical resource.

## Impact Analysis

### DEMOLITION

As discussed in Chapter II: Project Description, the proposed project would require demolition of the existing 1831-1835 Broderick Street building, a historic resource. Thus, the proposed project would have an unavoidable adverse effect on historic resources.<sup>19</sup> While implementation of Mitigation Measures 1, 2, and 3 (pages 68 to 68) would reduce this impact, the loss of the historical resource would be significant and unavoidable. It is not possible, under CEQA, to mitigate the loss of a resource significant for its architecture and contribution to a potential historic district with photographic documentation, original architectural plans, or salvaged materials. Therefore, impacts related to the demolition of the 1831-1835 Broderick Street building would remain significant and unavoidable.

As a contributor to the potential district, the 1831-1835 Broderick building's loss could contribute incrementally to a potentially significant cumulative impact that may exist in the loss of district integrity through ongoing removal of contributory residential buildings from the period of significance. Therefore, the proposed product would contribute to this potentially significant impact.

As the only remaining contributor on the west side of the 1800 block of Broderick Street, the building is somewhat peripheral to the district as a whole, even though the other faces of the same block (Assessor's Block 1029) may be included. The impaired integrity of the building also weakens the reliance of a district on inclusion of the building. The potential district may retain its integrity and its eligibility for the California Register without the 1831-1835 Broderick building.. However, comments received by the Department note a concern for the cumulative loss of this building type in the area often associated with a change from residential to institutional or commercial use. Cumulative impacts occur when a pattern exists over a period of time from previous and continuing projects associated by type. Cumulative impacts of prior development, including the expansion of Drew School in 2001, may be significant even if the incremental effect of the loss of the 1831-1835 Broderick building on the potential district appears would not be cumulatively considerable for reasons noted above. Therefore, the demolition of the 1831-1835 Broderick building as a contributor is a considerable contribution to a potentially significant cumulative impact.

With implementation of Mitigation Measure 3, page 69, cumulative impacts on historic resources would be reduced by providing information to the Department, on contributory structures identified in the course of this review, as well as a district context statement. These would advance the possible protection

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<sup>19</sup> Ibid, evaluation Item 4, pages 4 and 5.



of the district through formal designation, by providing the Department with the initial stage documentation necessary for such designation.

Relative to the impact of the loss of the individual building to the potential district, mitigation measure 3 would appear adequate to mitigate the project's incremental contribution to cumulative impacts to a less-than-significant level. However, since the extent of cumulative impacts are not fully known, and moreover, since historic designation is not currently planned and would be uncertain, any significant cumulative impact external to the project would remain.

To check the validity of the historic resource cumulative impact concerns, the Department conducted a preliminary geographic information system screening analysis. The initial properties reviewed were within the residential districts with concentrations of residential flats: RH-2, RH-3, RM-2, and RM-3 districts. Preliminary analysis showed a number of demolitions along California Street and interspersed in the area, including some blocks otherwise predominantly pre-1913 construction. The Drew School at 2901 California Street is among several schools in the vicinity where new facilities have been built within the last ten years, however in the case of Drew this was a replacement facility. In order to provide a more complete and accurate profile, additional analysis would be necessary.

With implementation of Improvement Measure 1, to continue to develop information useful to the Planning Department regarding certain residential conversions and demolitions, using geographic information system analysis with data available, residual incremental effects could be further reduced to extent the information supports a district designation by substantiating a significant cumulative impact threat.

While project impacts to historical resources would remain significant and unavoidable, residual incremental effects of the project would not be cumulatively considerable.

#### **NEW CONSTRUCTION**

The project would replace the 1831-1835 Broderick building with a contemporary structure in keeping with the existing Drew School, with a vegetated wall facing the street. With the proposed structure, the massing of the campus would be roughly symmetrical along Broderick Street: a courtyard entry framed by block masses, on either side, of roughly three-story by three-bay size.

For new construction within designated historic districts or conservation areas, projects are subject to approval under Article 10 of the Planning Code, for Certificate of Appropriateness approval by the San Francisco Planning Commission and Landmarks Board. For new residential construction within residential areas without historic designation, such as the project site zoned RM-1 (Residential, Mixed,

Low-Density)), projects are reviewed for approval pursuant to the Planning Department's Residential Guidelines Section 311(c)(l) of the *Planning Code*. It states that construction of new residential buildings and alteration of existing residential buildings in R districts shall be consistent with the design policies and guidelines of the *General Plan* and with the "Residential Design Guidelines" and that the Planning Director may require project modifications for conformity. However, the Residential Guidelines do not apply to institutional construction in R districts.

The proposed project at 1831-1835 Broderick would have an adverse effect on a potential California Register Historic District in this portion of the Western Addition. The project as proposed is clearly differentiated from the historic structures in the neighborhood and designed to be compatible with the contemporary Drew School. The school addition is inconsistent with the existing lot pattern of the street and does not relate to the historic structures in the neighborhood in terms of fenestration (window, door) pattern, scale, massing, and materials. As such, the defining characteristics of the potential historic district would not be reflected in the new construction as proposed. The project could have a potentially significant adverse impact on a California Register-eligible Historic District.



## D. TRANSPORTATION/CIRCULATION

This section describes existing transportation conditions (roadway traffic, transit, parking, pedestrian, and bicycle conditions) in the vicinity of the proposed project, and evaluates the transportation impacts of the proposed school addition. This section summarizes the results of a transportation impact analysis prepared for the proposed project.<sup>7</sup> The transportation analysis was conducted based on the methodology presented in the San Francisco Planning Department's *Transportation Impact Analysis Guidelines for Environmental Review* October 2002 (*SF Guidelines*).

### SETTING

The Drew School is located at the southwest corner of California and Broderick Streets and used by approximately 243 students and 52 full and part-time faculty. The school operates during a September to June academic year and has summer sessions. The students arrive at the school starting at 7:30 a.m. and depart in the afternoon from 2:30 to 3:30 p.m., although many stay longer for extra-curricular activities. In addition, there are a limited number of small school functions on evenings and weekends.

#### Street Network

The project site is located in the Lower Pacific Heights area of San Francisco. California Street in the project vicinity is a two-way, east-west street with two travel lanes in each direction, and on-street parking on both sides. In the vicinity of the project, Broderick Street a two-way, north-south street with one travel lane in each direction, and on-street parking on both sides. Pine Street is a one-way westbound street in the vicinity of Drew School, with three travel lanes and on-street parking on both sides.

In the *General Plan*, California Street is designated as a Secondary Arterial in the vicinity of Drew School. Pine Street is designated as a Major Arterial and a Freight Traffic Route.

The intersections of California/Broderick and Pine/Broderick are signalized.

#### Traffic

Intersection operating conditions are described by Level of Service (LOS), which provides a description of an intersection's performance based on traffic volumes, intersection capacity, and vehicle delays. LOS A represents freeflow conditions, with little or no delay, while LOS F represents congested conditions, with

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<sup>7</sup> CHS Consulting Group, *Drew School Assembly Wing Transportation Study*, February 2008. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.

extremely long delays; LOS D (moderately high delays) is considered the lowest acceptable level in San Francisco.

The peak morning arrival time at the Drew School (the period of greatest school-generated traffic) coincides with the peak commuter hours on the adjacent streets. During the weekday a.m. peak hour, the intersections of California/Broderick and Pine/Broderick both operate at LOS B (a 13.8 second delay/per vehicle, and a 12.2 second delay/per vehicle, respectively).<sup>20</sup>

## Transit

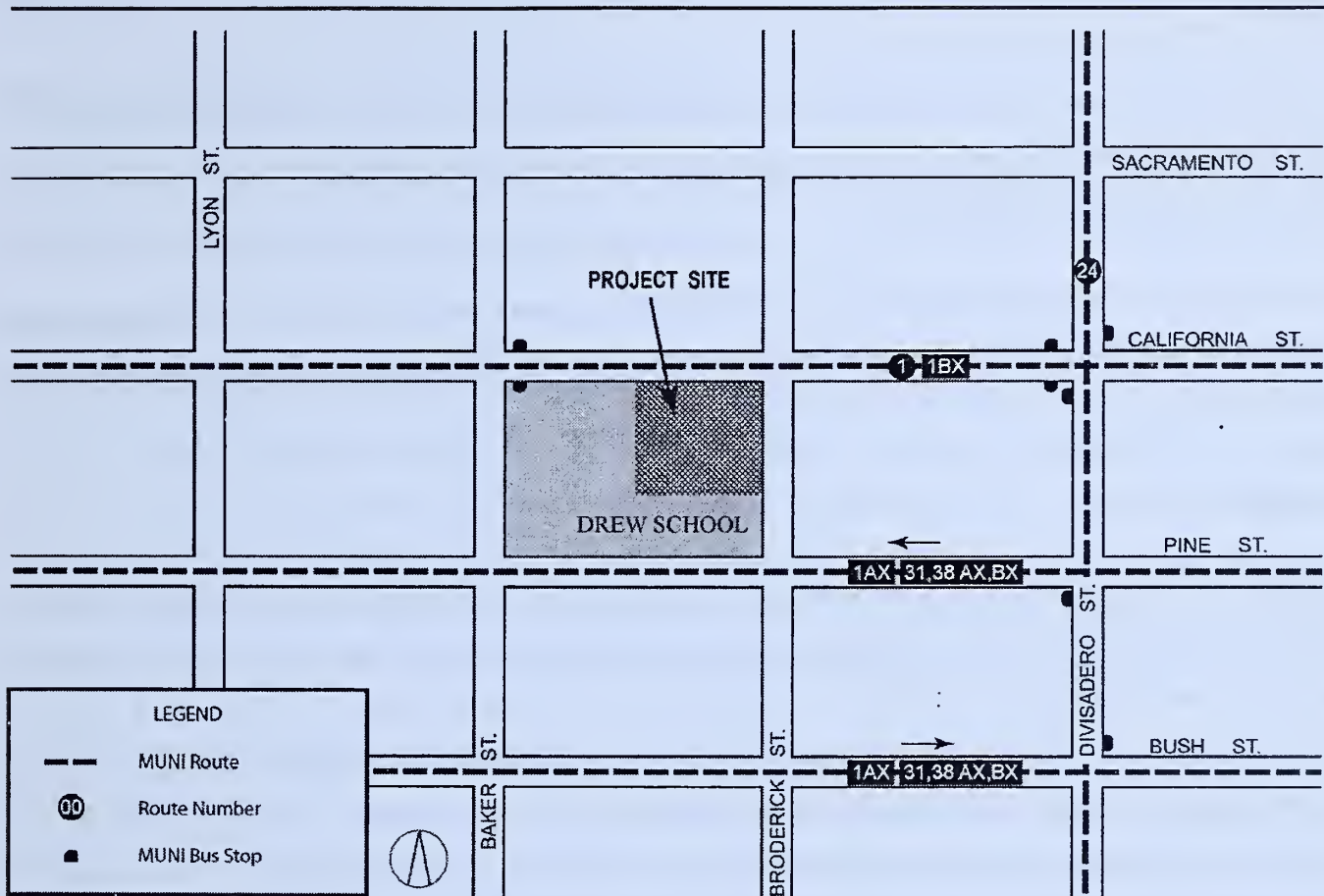
The project site is well served by public transit, with MUNI and regional transit providing service in the immediate vicinity (see Figure 14, page 55, for a map of existing transit networks and stop locations). MUNI lines passing within one block of the project site include the 1-California, 1AX-California "A" Express, 1BX-California "B" Express, 24-Divisadero, 31-Balboa, 38AX-Geary "A" Express, and 38BX-Geary "B" Express. The closest MUNI bus stops are at the intersections of California and Baker Streets (1-California), approximately one-half block (500 feet) west of the California Street pedestrian-only school entrance, and at California and Divisadero (1-California and 24--Divisadero), about one and one-half blocks (1,500 feet) from the same school entrance. The 1-California operates every three minutes, at approximately 56 percent of its capacity during the a.m. peak hour and the 24-Divisadero operates every 7-8 minutes at about 37 percent capacity in the vicinity of Drew School. The 1BX-California and 38BX-Geary have a stop at the intersection of California and Presidio Avenue, approximately three blocks (3,000 feet) to the west of Drew School. The 31-Balboa has stops near the Divisadero/Pine intersection for westbound and the Divisadero/Bush intersection for eastbound vehicles, approximately one and one-half (1,500 feet) and two and one-half blocks (2,500 feet) to the south, respectively, from the Broderick Street school entrance.

The nearest BART station (Civic Center) is approximately 1.5 miles southeast of the project site on Market Street. It provides a direct connection to the 31-Balboa (three block walk north on Hyde Street to Turk Street). Connecting to the 38-Geary from the Civic Center BART Station would require an eight block walk north on Hyde Street to Geary Street, or exiting BART at the Montgomery Station for a direct connection. Exiting BART at the Embarcadero Station would provide a direct connection to the 1-California.

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<sup>20</sup> Ibid, page 14.





Source: CHS Consulting Group

9-19-08

Existing Transit Networks and Stop Locations Figure 14

## **Parking**

The existing Drew School has 29 classrooms and a parking garage with 21 spaces reserved for employees. It also leases 11 parking spaces in a church parking lot on the north side of Pine Street, west of Broderick Street, for its students and employees.

The 16-block area encompassing the project site has 703 on-street parking spaces, of which a survey found that 639 (91 percent) were occupied before 8:15 a.m. and 666 (95 percent) were occupied after 8:15 a.m.<sup>12</sup>

## **Pedestrian**

California and Pine streets carry a relatively high volume of fast moving traffic. The closest signalized crossing is at the intersection of California Street and Broderick Street to the south. Each signalized intersection has crosswalks, including the intersection of California Street and Broderick Street. Pedestrian conditions in the vicinity of the project, on both sidewalks and crosswalks, were observed to be operating at acceptable levels of service. Pedestrian levels in the vicinity of the project, on both sidewalks and crosswalks, were observed to be low to moderate, with pedestrians able to move freely. No sidewalk or capacity-related issues were visible during field observations, but pedestrian-vehicle conflicts were observed during the 30 minutes before school begins and 30 minutes after school ends.

## **Bicycles**

There are four designated Citywide Bicycle Routes in the vicinity of the project site (Route 10–Clay Street; Route 16–Post Street, Route 55–Presidio Street, Route 45–Steiner Street). During a field survey, few bicyclists were observed to be riding in the vicinity of the project site.

## **Loading**

The number of delivery and service vehicle trips to Drew School is relatively low. Trucks generally use Broderick Street next to the garage to unload. Mail deliveries, such as USPS, UPS, or FedEx, usually use California Street for a brief period. No obvious existing loading conflicts were observed.

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<sup>12</sup> Ibid.



## IMPACTS

### Significance Criteria

The following are the significance criteria used by the Planning Department's *SF Guidelines* for the determination of impacts associated with a proposed project.

#### INTERSECTIONS

The operational impact on signalized intersections is considered significant when project-related traffic causes the intersection level of service to deteriorate from LOS D or better to LOS E or LOS F, or from LOS E to LOS F. The operational impacts on unsignalized intersections are considered potentially significant if project-related traffic causes the level of service at the worst approach to deteriorate from LOS D or better to LOS E or LOS F and Caltrans signal warrants would be met, or would cause Caltrans signal warrants to be met when the worst approach is already operating at LOS E or LOS F.

A project may result in significant adverse impacts at intersections that operate at LOS E or LOS F under existing conditions depending upon the magnitude of the project's contribution to the worsening of the average delay per vehicle. In addition, the project would have a significant adverse impact if it would cause major traffic hazards or contribute considerably to cumulative traffic increases that would cause deterioration in levels of service to unacceptable levels.

#### TRANSIT

A project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs so that significant adverse impacts in transit service levels could result. With the Muni and regional transit screenlines analyses, a project would have a significant effect on the transit provider if project-related transit trips would cause the capacity utilization standard to be exceeded during the p.m. peak hour.

#### PARKING

San Francisco does not consider parking supply as part of the permanent physical environment. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on

the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact (CEQA Guidelines Section 15131(a)). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles, or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service, in particular, would be in keeping with the City's "Transit First" policy. The City's Transit First Policy, established in the City's Charter Section 16.102, provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise, and pedestrian safety analyses, reasonably address potential secondary effects.

#### **PEDESTRIANS**

The project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.

#### **BICYCLES**

The project would have a significant effect on the environment if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.



## LOADING

A project would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed on-site loading facilities or within convenient on-street loading zones, and would create potentially hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

## CONSTRUCTION

Construction-related impacts generally would not be considered significant due to their temporary and limited duration.

## Traffic Impacts

Approximately 65 percent of employees and 63 percent of students of the Drew School travel by auto (including students who are dropped off and who carpool).<sup>8</sup> The additional three employees and 37 students would generate up to approximately additional 25 vehicle trips in the a.m. peak period. These trips would be added to the above intersections north and south of the project site. The proposed project may result in average delays of approximately 13.9 seconds per vehicle at the California/Broderick intersection (an increase of 0.1 second) and 12.4 seconds per vehicle at the Pine/Broderick intersection (an increase of 0.2). These 0.1 and 0.2 second increases in average delay would not be substantial and drivers would be unlikely to notice the delay. The proposed project would not change the Levels of Service "B" at the intersections. Project traffic volume impacts would be less than significant.

The Drew School has a policy that requires all parents to use the west side of Broderick Street for student drop-off and pick-up activities.<sup>9</sup> Field observation shows some parents double parked their vehicle and dropped off students on the east side of Broderick Street in the northbound direction. In addition, a few parents traveled northbound on Broderick Street and then made a left turn in front of the school garage driveway, partially blocking the sidewalk, dropped off students, and then reversed the vehicle to go south on Broderick towards Pine Street in both the a.m. and p.m. peak periods. Those students dropped off on the east side of Broderick Street usually jaywalked across the mid-block of Broderick Street. Double parking was also observed occasionally during drop-off and pick-up activities in both directions of Broderick Street. This violation does not appear to pose significant traffic congestion or safety problems because traffic volume is light along this block of Broderick Street. It does cause a nuisance for the duration of the drop-off and pick-up periods, and potential safety concerns for students jaywalking across Broderick Street.

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<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

The project would incrementally contribute to the existing pick-up/drop-off activities along Broderick Street. Extending the existing white zone along Broderick Street, changing the hours of the white zone, providing additional transit information and bike education, incentivizing ride-sharing, continuing to enforce school pick-up/drop-off policy, and enforcing restrictions against left turns and U-turns in the middle of Broderick Street would reduce potential vehicle/vehicle and vehicle/pedestrian conflicts (see Improvement Measures 1 through 4, beginning on page 72).

Cumulative traffic growth would occur from other developments throughout San Francisco, as well as from the proposed project. Under 2025 Cumulative conditions, traffic is anticipated to increase in much of the City, and levels of service at some intersections may deteriorate to unacceptable levels (LOS E or LOS F). Although local neighborhood traffic would be expected to increase at intersections in the project vicinity, it is unlikely that the increase would be substantial because of limited neighborhood development potential. These conditions would occur with or without the project and the proposed project's contribution of 25 vehicle trips to total 2025 Cumulative volumes and to the growth between Existing and 2025 Cumulative conditions would be small. The project would therefore not be expected to contribute significantly to 2025 Cumulative conditions, and would not have any significant cumulative traffic impacts.

### **Transit Impacts**

Approximately 24 percent of employees and 27 percent of students of the Drew School travel by transit.<sup>10</sup> The additional three employees and 37 students would generate approximately nine additional inbound transit trips in the a.m. peak period and nine additional outbound transit trips in the p.m. peak period. These trips would be distributed over the transit lines serving the area. The increase in transit demand associated with the project's twelve percent increase in student population and its nine additional transit trips would not noticeably affect transit services in the area or affect acceptable transit operations. As noted above, the 1-California operates at approximately 56 percent of its capacity during the a.m. peak hour and the 24-Divisadero operates at about 37 percent capacity in the vicinity of Drew School. In view of the above, project impacts on public transit would not be significant.

### **Parking Impacts**

With the four additional classrooms of the proposed expansion, the Drew School would have 33 classrooms, for which 17 spaces would be required. The proposed project would not add parking facilities. In the RM-1 district, the *Planning Code* parking requirement for secondary schools is one space

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<sup>10</sup> Ibid.



per two classrooms. The existing 21 spaces would comply with the *Code* requirement for parking, and no additional parking spaces would be required as part of the proposed expansion.

Approximately 65 percent of employees and 37 percent of students of the Drew School travel by auto (excluding students who are dropped off).<sup>11</sup> The additional three employees and 37 students would generate a demand of approximately 16 long-term parking spaces (which can differ from the *Planning Code* parking requirement). It is anticipated that the Drew School's new students and employees would park in the same locations as current students and employees: the Drew School's 21-space parking garage, an off-street church parking lot on the north side of Pine Street west of Broderick Street where 11 spaces are available to Drew School students and employees, and nearby streets.

While the project would not provide any additional parking spaces, the project-generated parking demand for 16 parking spaces would be less than the approximately 64 available on-street parking spaces in the surrounding 16-block area before 8:15 a.m. In any case, it should be noted that parking shortfalls are not considered significant environmental impacts in the urban context of San Francisco, as discussed under Significance Criteria, above, and the project would not cause a significant environmental impact. However, encouraging alternative modes of travel and car-sharing would lessen parking impacts (see Improvement Measure 4, page 73) and is consistent with the existing Conditional Use authorization conditions.

## **Pedestrian Impacts**

Approximately five percent of employees and eight percent of students walk to the Drew School.<sup>13</sup> At these percentages, the additional three employees and 37 students would generate approximately three walk trips in the a.m. and p.m. peak hours. The project is not expected to substantially change the existing pedestrian conditions and would not result in any significant impacts on pedestrian conditions.

## **Bicycle Impacts**

Bicyclists would approach the school from any direction depending on the origin of their trip. Although the proposed project could result in an increase in the number of vehicles in the vicinity of the project site, this increase would not be substantial enough to affect bicycle travel in the area, and project impacts on bicycles would be less than significant.

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<sup>11</sup> Ibid.

<sup>13</sup> Ibid.

There are two bike racks in the school's existing automobile garage with a capacity of 30 bike slots. No bicycle parking spaces would be provided in the proposed school expansion project, and none is required in the *Planning Code*.

### **Loading Impacts**

No off-street loading spaces would be provided in the proposed school expansion project, and none is required in the *Planning Code* for RM-1 districts. The number of additional delivery and service vehicles generated by the proposed 15,604-square-foot school expansion would be relatively low. Adding to the school's existing demand, deliveries would include supplies, classroom materials, and possible stage performance materials, some of which would use standard delivery services like USPS, FedEx or UPS. There would be no change to the number of loading activities of these standard carriers, as new deliveries are expected to be consolidated with present deliveries. Deliveries are currently made without difficulty of conflict at the curb on California Street, where the Drew School has a pedestrian entrance. Any deliveries to the new addition could be made on Broderick Street, the location of the entrance to the Drew School's parking garage as well as a second pedestrian entrance. There would be little if any change from existing conditions where no conflicts have been observed.

If a parking space is not available to accommodate the loading demand, delivery and service vehicles would likely double-park on California or Broderick Streets. Near the project site, California Street has two travel lanes in each direction, and Broderick has one travel lane in each direction. Through traffic could bypass double-parked delivery and service vehicles. Because traffic on California Street is fast-moving, use of Broderick Street would be a safer place for delivery loading/unloading. However, double parking would not substantially affect traffic flow on either California or Broderick Streets, and would not result in a significant environmental impact.

### **Hazards**

As discussed above under Traffic, double-parking, turning movements, and pedestrian street crossings during drop-off and pick-up activities attributable to the building addition would incrementally contribute to, but would not result in new significant safety problems. Improvement Measure 3, page 68, would reduce vehicle/vehicle and vehicle/pedestrian conflicts. The proposed project would not include any features that would introduce hazards to the travel environment (e.g. visual distractions). The proposed project would not result in a change in air traffic patterns, and, therefore, would not result in substantial safety risks related to air traffic. For these reasons, these potential safety impacts would be considered less-than-significant.



## Construction Impacts

The project construction duration is anticipated to be approximately 13 months and there would be a flow of construction-related trucks into and out of the site. Demolition and excavation stages would involve construction truck trips hauling excavated soil and demolished building materials off site. Foundation construction would also involve cement truck trips. Building construction (exterior, interior, finishing), would involve construction material delivery truck trips. All phases would involve construction worker vehicle commute trips. All phases would require construction material storage and equipment staging, especially during the period of concrete pouring. The greatest number of construction trucks per day is estimated to be 12 during the first month, declining to four in the second month and ultimately two in the final three months.<sup>14</sup> In months seven and eight at the peak of construction, 40 construction worker vehicles per day are anticipated, varying from 14 vehicles per day in the first month to 24 vehicles per day in the 13<sup>th</sup> month. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect both traffic and transit operations. Pedestrian traffic may be interrupted by construction activities or materials staging. Construction workers who drive to the site would cause a temporary parking demand.

To address the construction impacts discussed in the preceding paragraph, the project sponsor proposes to develop a construction traffic management plan that would include the following topics: construction schedule, construction vehicle staging, construction truck route, size of construction vehicles, materials staging, pedestrian walkways, construction worker parking, construction traffic management, student pick-up and drop-off. The main proposals are discussed below, and the contractor would work with the City's Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) to finalize the construction traffic management plan.

Construction vehicles would enter the project site from California Street and exit to Pine Street. If an offsite staging area on Pine Street (discussed below) is employed, trucks would turn right to Baker Street, turn right again to California Street, and then turn right onto Broderick Street to enter the project site (see map on page 32 for reference). The size of construction vehicles would be limited to seven cubic yards in order to minimize construction traffic impacts, though on occasion bigger trucks may be required.

The construction contractor would hire a flagman to direct construction vehicle ingress and egress, and barricades and fences would be used to secure the construction site. The construction contractor would schedule the peak construction period, especially foundation and concrete pouring, during the summer

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<sup>14</sup> Ibid.

when there are no school activities (from the second week of June to the end of August). Concrete pouring would typically take one day, but would require concrete trucks queuing in front of the construction site. Because concrete pouring must be continuous, concrete trucks would require either an offsite staging area or parking space in the vicinity of the construction site. The project sponsor would coordinate with the Traffic Engineering Division of the Department of Parking and Traffic (DPT) and the Police Department to establish areas for offsite concrete truck staging. A potential area would be Pine Street between Divisadero and Baker Streets. Pine Street is a designated Freight Traffic Route, and operates one-way westbound with three traffic lanes and parking on both sides.

The project sponsor and construction contractor(s) would meet with the DPT and the Police Department to determine feasible traffic mitigation measures to reduce traffic congestion and other potential transit disruption and pedestrian circulation effects during construction of the project, including relocating the existing white zone from Broderick Street to California Street during the construction period (see Improvement Measure 5, on page 74).

There are no Muni bus stops on Broderick Street in front of the project block, and no bus stop relocation would be required. The construction contractor would install a temporary covered pedestrian walkway along the project frontage throughout the entire construction period, to allow continuous pedestrian flow along the west side of Broderick Street.

Construction workers who drive to the site would cause a temporary parking demand. As identified in the Construction Management Plan, the construction contractor would provide offsite parking for the construction workers, so construction workers would not occupy the limited number of on-street parking spaces in Lower Pacific Heights.

The impacts of construction on parking and traffic would be limited in scope and temporary in duration, and would not be significant. However, limiting construction-related truck traffic during peak periods would lessen construction period impacts (see Improvement Measure 5, on page 74).



## E. GROWTH INDUCEMENT

A project would have growth inducing impacts if (1) its construction and use would encourage a substantial population increase; (2) it would indirectly stimulate new development that would not otherwise occur; or (3) it would require new infrastructure (such as water or sewer utilities) with capacity to serve other projects. The proposed infill project would demolish three existing residential units and construct a 15,604-square-foot addition to the Drew School. Approximately six residents would be displaced from the site, and the school expansion would employ an additional three faculty/administrative staff and accommodate an additional 37 students. The project would not replace the demolished housing, but would provide a small amount of additional employment and associated housing demand, and capacity for additional students. The elimination of existing housing and the housing demand of the three additional employees would be small relative to the current number of vacant residential units in San Francisco, and the additional capacity for students would not encourage a substantial population increase. The proposed project would be located in an urbanized area and would not provide new infrastructure that would increase existing utility service capacity. The project's conversion of a residential building to school uses may increase demand for institutional land uses in the project vicinity, but, for the reasons discussed above, the proposed project would not cause significant growth-inducing impacts.

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## IV. MITIGATION AND IMPROVEMENT MEASURES

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In the course of project planning and design, measures have been identified that would reduce or eliminate potentially significant environmental impacts of the proposed project. Decision-makers would require mitigation measures and may require improvement measures identified in this EIR and in the Initial Study as conditions of project approval, unless they are demonstrated to be infeasible based on substantial evidence in the record. Implementation of some measures may be the responsibility of public agencies. This chapter includes two types of measures: (1) mitigation measures that would avoid potentially significant impacts; and (2) improvement measures proposed to improve less-than-significant project effects. Measures from the Initial Study (see Appendix A) proposed as part of the proposed project are indicated with an asterisk (\*). Mitigation Measures 1, 2, and 3 were added as part of this DEIR, and Mitigation Measure 6 from the Initial Study was expanded as part of this DEIR to respond to comments received on the "Notice of Preparation of an Environmental Impact Report" (see V.B Areas of Controversy and Issues to be Resolved).

### A. MITIGATION MEASURES

#### HISTORICAL ARCHITECTURE RESOURCES

The mitigation recommendations presented in this section are based on the approaches identified by the *CEQA Guidelines* for mitigating environmental impacts. These approaches include:

- a) *Avoiding* the impact altogether by not taking a certain action or parts of an action;
- b) *Minimizing* impacts by limiting the degree or magnitude of the action and its implementation;
- c) *Rectifying* the impact by repairing, rehabilitating, or restoring the impacted environment;
- d) *Reducing or eliminating* the impact over time by preservation and maintenance operations during the life of the action; or
- e) *Compensating* for the impact by replacing or providing substitute resources or environments.

There are few, if any, measures that can mitigate the loss of this historically significant building to a less-than-significant level. It is not possible, under CEQA, to mitigate the loss of a resource significant for its historic association and architecture with photographic documentation, original architectural plans, or

salvaged materials. Therefore, impacts related to the demolition of the 1831-1835 Broderick Street building would remain significant and unavoidable.

### **Mitigation Measure 1**

- Prior to demolition, the project sponsor shall provide adequate documentation of the existing building. The documentation shall be submitted to the City and County of San Francisco Planning Department and found to be adequate prior to authorization of any permit that may be required for demolition of the building. In addition, the project sponsor shall prepare and transmit the photographs and descriptions of the property to the History Room of the San Francisco Public Library.
  - Images must be fully identified with the name and location of the structure, a description of the feature or view being photographed and the direction in which the photograph was taken, as well as the name of the photographer and the date created.
  - Black and white, 35-millimeter photographs of the interior and exterior of the building. Negatives and 5-by-7 inch prints should be processed to meet archival requirements (i.e., negatives must be on safety film only; resin-coated paper is not accepted).
  - If there is a historic photo showing the building's context on Broderick Street, another photo should be taken from the same vantage point and retained and displayed at Drew School

### **Mitigation Measure 2**

As part of deconstruction, prior to demolition, the project sponsor shall salvage the original character-defining entry features of the existing building for possible reuse in a future historic district, and shall seek to donate those elements to an organization such as a local historical society. The architect and builder shall seek an interested neighborhood organization to look after these salvage materials so they are stored appropriately, for reuse in restoration. The City, prior to the issuance of building permits, shall confirm donation of the materials to the historical society or other entity approved by the City.

### **Mitigation Measure 3**

In order to reduce adverse impacts to the potential historic district, research conducted in the course of the environmental review of this project shall be compiled for future reference and usefulness. Further documentation of the potential district would hasten the ability for San Francisco to designate such an historic district and enact preservation controls as warranted. The sponsor's Preservation Consultant shall organize this information, and supplement existing data only where necessary to complete items (3.A and 3.C) noted below. This information shall be made available to Drew School, to the Planning Department, and through the Department to the public, for educational use, and for use by the Department in future Preservation survey and district designation programs. Three (3) copies and an electronic file of the



following shall be provided to the Planning Department, for the Environmental, Preservation, and Landmark review libraries:

- A. A context statement related to the 271 surrounding buildings photographed in the consultant-prepared April 2007 evaluation of 1831-1835 Broderick Street.
- B. A table of spreadsheet of the 271 properties involved and their status as possible contributors to a district based on the context statement.
- C. General direction for future survey activity building on the report described above.

## ARCHEOLOGY (ACCIDENTAL DISCOVERY)

### \* Mitigation Measure 4

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this

information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archaeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Major Environmental Analysis (MEA) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: one copy to California Archaeological Site Survey Northwest Information Center (NWIC); three copies to the Major Environmental Analysis division of the Planning Department with a copy of the transmittal of the FARR to the NWIC and copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

## CONSTRUCTION AIR QUALITY

### \* Mitigation Measure 5

The following measures from the BAAQMD *CEQA Guidelines* would reduce construction air quality impacts to a less-than-significant level. The project sponsor shall:

- Water all construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials *or* require all trucks to maintain at least two feet of freeboard.
- Apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers) if visible soil material is carried onto adjacent streets.



- Install wheel washers for all existing trucks, or wash off the tires or tracks of all trucks and equipment leaving the site.
- Install windbreaks, or plant trees/vegetative breaks at windward side(s) of construction areas.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.
- Limit the area subject to excavation, grading, and other construction activity at any one time.

Ordinance No. 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. The project sponsor shall require the construction contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose.

The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants by such means as prohibiting idling motors when equipment is not in use or when trucks are waiting in queues, and implementing specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

## **HAZARDOUS MATERIALS IN EXISTING BUILDING (PCBS, MERCURY, LEAD AND OTHERS)**

### **\* Mitigation Measure 6**

Prior to demolition of the structure on site, the project sponsor shall ensure that pre-construction building surveys for PCB- and mercury-containing equipment, fluorescent lights, lead, mercury, Naturally Occurring Asbestos (NOA), organochlorine pesticides, and other potentially toxic materials are performed. Any hazardous materials so discovered shall be abated according to federal, state, and local laws and regulations.

## **B. IMPROVEMENT MEASURES**

Improvement measures are recommendations to diminish the effects of the project that were found to result in less-than-significant impacts. Improvement measures designed to reduce already less-than-significant impacts are listed below, and may be implemented, with agreement from the project sponsor, and included as conditions of approval when the Planning Commission acts on the project (see discussion on page 71). Such conditions of approval may include revisions to existing conditions of approval as well as new conditions of approval. Measures that add to or expand upon existing Conditions of Approval are noted. The existing Conditions of Approval are reprinted in Appendix B.

## CUMULATIVE LAND USE CONVERSION AND HISTORIC RESOURCES

While the proposed school expansion would not induce growth directly or indirectly, the potential cumulative impact of successive projects involving expansion of institutional uses in the area is not fully known. However, existing oversight through the Conditional Use application and approval process addresses potential impacts. The following improvement measure would evaluate and address the land use issue.

### Improvement Measure 1

The Planning Department would continue to develop, within six months time of FEIR certification, geographic information system analysis of Conditional Use authorizations for changes of residential land use to other use types within the Residential and Neighborhood Commercial Districts along the Sacramento through Pine Street corridors of lower Pacific Heights using existing Planning Department data, including age of structure and demolition or new construction. The information resulting from this analysis would be forwarded to the Citywide long-range planning division of the Department and the Preservation Coordinator for use supporting future surveys and area plans.

## EXTEND WHITE ZONE ALONG BRODERICK STREET

### \* Improvement Measure 2

The existing white zone on Broderick Street is in front of the Drew School. The project sponsor should seek to extend the white zone on Broderick Street beyond the courtyard and entrance/exit to the parking garage to the 1831-1835 Broderick Street frontage. If the DPT approves this measure, extending the current white zone would add two more parking spaces (approximately 37.5 feet) for student drop-off and pick-up, and would reduce the need for double parking on Broderick Street. This measure would extend the length of the white zone identified in the 1999 Conditional Use application to match the extended frontage of the Drew School Addition currently proposed.

## MODIFY TIMING OF OPERATION OF WHITE ZONE

### \* Improvement Measure 3

The signage for the existing white zone on Broderick Street in front of the school is from 8:00 to 8:30 a.m. and from 1:30 to 3:30 p.m. School operations have changed and the white zone period should be modified to 7:30 to 8:30 a.m. and from 2:30 to 3:30 p.m.. If DPT agrees to the modification, this measure would extend the a.m. hours and reduce the p.m. hours restricted for pick-up from the white zone fronting the project site, as reflected by signage. If DPT agrees to the modification, the school should review, at



intervals determined by the San Francisco Planning Department, whether the modified hours adequately accommodate pick-up of students, and whether any subsequent adjustments are required. The school should report the results of its monitoring to the Department.

## TRANSPORTATION DEMAND MANAGEMENT

### \* Improvement Measure 4

The existing CU states that the School shall establish a program to reduce vehicle usage by students and faculty and encourage transit and alternative means of transportation. Such program should include an advertised system of internally coordinating care pools, incentives and information regarding public transit, and encouragement of the use of bicycles. Information on such a program and advisement of the sensitivity of parking and drop-off loading the area shall be included in the student/parent and employee information packages.

The existing CU indicates that the School shall provide attendants or monitors to supervise and direct traffic and parking adjacent to the School campus during primary drop-off and pick-off times before and after school is in session to discourage double parking and promote the orderly flow of traffic. The school shall take all reasonable actions to prevent any school related double parking or loading on California Street frontage that might interfere with Muni Railway's operation of the 1 California trolley line.

The project would seek a Conditional Use Authorization to allow an increase of 30 students and three additional staff. The School will continue to implement the TDM program with:

- incentives for ridesharing, bicycle riding and walking by staff and faculty; provision of secure bicycle parking within the garage or proximate to the school entry;
- the aim of an overall reduction of single-ridership by staff and faculty by 25 percent;
- "no net increase" on parking demand through encouraging use of alternative modes;
- information that stresses the environmental and health benefits of trip reduction;
- information on bike routes, specific transit service (stop locations, MUNI and BART lines, fares, schedules matching the school arrival and departure times), information on where FastPasses could be purchased, and information on the 511 Regional Rideshare Program.
- seeking the cooperation of the parent organization to arrange carpooling and incentivize participation.

The school should submit reports on compliance with this measure )and the effectiveness of the program in reducing school drop-offs relative to enrollment to the San Francisco Planning Department at intervals determined by the Department. This measure would expand on efforts identified in the 1999 Conditional Use application, Condition #8.

## CONSTRUCTION TRAFFIC MEASURES

### \* Improvement Measure 5

The following measures would minimize disruption of the general traffic flow on adjacent streets:

- To the extent possible, truck movements should be limited to the hours between 9:00 a.m. and 2:30 p.m. (or other times, if approved by the Department of Parking and Traffic [DPT]).

The project sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic (DPT), the Police Department, the Fire Department, Muni's Street Operations and Special Events Office, the Planning Department, and other City agencies to determine feasible traffic measures to reduce traffic congestion and other potential transit disruption and pedestrian circulation effects during construction of the project, including temporary relocation of the existing white zone from Broderick Street to California Street during the construction period.

- The construction contractor would hire a flagman to direct construction vehicle ingress and egress, and barricades and fences would be used to secure the construction site.

## CONSTRUCTION NOISE MEASURES

### \* Improvement Measure 6

The following standard measures, if implemented, would reduce the proposed project's construction noise impact on nearby sensitive receptors.

- Construction hours would be limited to the hours between 7:00 AM and 8:00 PM. A special permit should not be granted to extend hours unless there is an emergency because of the proximity of residential receptors.
- All internal combustion-driven construction equipment would be properly muffled and maintained. If an individual piece of construction equipment generates noise levels exceeding the noise limits set forth in the San Francisco Noise Ordinance, it would cease operating until it can be modified or replaced.
- Utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.
- Prohibit unnecessary idling of internal combustion engine.
- Erect temporary portable noise control screens around the area where the concrete saw is operating.
- Designate a "noise disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (e.g., starting too early, bad muffler, etc.) and institute reasonable



measures warranted to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site.

In addition to the above standard measures, the measures below would further reduce the proposed project's construction noise impact on school and nearby church operations.

- The noise disturbance coordinator would coordinate with school administrators to minimize classroom disruption caused by impact and other tools during the construction period.
- The noise disturbance coordinator would coordinate construction activities with the Seventh Day Adventist Church (2889 California Street, at the southeast corner of Broderick and California Streets) in order to limit the use of impact tools during weekend and evening church services.

This improvement measure was not identified in the 1999 Conditional Use application.

## **CONTROL OF PUBLIC NUISANCES**

### **Improvement Measure 7**

The School will continue to maintain a community liaison officer to receive complaints and communicate to the school community and neighbors the expectations of conduct and penalties for failure to comply or respond to concerns regarding such student behavior as loitering, smoking, and excessive noise making.

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## V. OTHER CEQA ISSUES

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This chapter discusses other CEQA-required topics, including significant and unavoidable environmental effects of the proposed project and areas of controversy and issues to be resolved.

### A. SIGNIFICANT UNAVOIDABLE EFFECTS

In accordance with CEQA, this section identifies environmental impacts that mitigation measures could not eliminate or reduce to an insignificant level as described in Chapter IV: Mitigation and Improvement Measures, pages 67 through 71 (CEQA Statutes Section 21100(b)(2)(A), and CEQA Guidelines Section 15126.2). This chapter is subject to final determination by the Planning Commission as part of its certification of the EIR, and staff will revise it to reflect the findings of the Planning Commission, if necessary.

As described in Chapter III, Section C: Historical Architectural Resources, the existing building at 1831-1835 Broderick Street is an historical resource based on its contribution to a potential historic district. Demolition of this building under the proposed project would have a substantial adverse impact. Implementation of Mitigation Measures 1, 2, and 3, pages 68 to 68, would reduce the direct impact of demolition by documenting the existing building and salvaging character-defining historic materials from the building, but the impact would remain significant and unavoidable. The proposed project demolition would have the incremental effect of adding to the potentially adverse cumulative impacts of demolition of historic district contributing buildings, but not one believed to be cumulatively considerable. Should the Planning Commission approve the project as proposed, it would be required to make a finding that the proposed project would have a significant project-specific environmental impact and would adopt a Statement of Overriding Considerations.

With implementation of the mitigation measures outlined in Chapter IV: Mitigation and Improvement Measures of this report, all other potential significant impacts would be reduced to a less-than-significant level.

## B. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

This Draft EIR assesses the significance of historical architectural resource impacts. The Initial Study (see Appendix A) found that all other environmental effects would be less than significant, in some cases with required mitigation measures to which the project sponsor agreed.

On March 8, 2008, the Planning Department issued a "Notice of Preparation of an Environmental Impact Report." Groups and individuals commented and expressed concern regarding potential effects of the proposed project including (section where analysis is contained immediately follows) cumulative land use impacts (Chapter III.A of this EIR), project-specific and cumulative impacts on aesthetics (Chapter III.B of this EIR), light and glare (Chapter III.B of this EIR), project-specific and cumulative impacts on housing stock (Topic 1 of the Initial Study), project-specific and cumulative impacts on traffic and parking (Chapter III.C of this EIR), project-specific and cumulative impacts on historic resources (Chapter III.D of this EIR), noise (Topic 6 of the Initial Study), and hazardous materials including Naturally Occurring Asbestos (NOA), lead paint, and organochlorine pesticides (Topic 15 of the Initial Study and Chapter IV of this EIR). Comments were also made regarding the merits of the project. These are not relevant to CEQA analysis of environmental impacts, but may be taken into account by the Planning Commission and other decision-makers as part of the project approval process.

Comments regarding nuisance issues and student conduct are addressed by existing rules and by maintaining a community liaison officer to effectively answer complaints. The Drew School Student Handbook contains rules forbidding tobacco use and requiring respectful behavior in the neighborhood.<sup>21</sup> These rules apply "during school", which is defined as the "entire day from the early morning until the student has gone home for the day and is no longer in the school neighborhood or traveling in the company of other students." The Student Handbook details consequences for violations of these rules, which are intended to discourage loitering and smoking in the project vicinity by students. While loitering is a potential nuisance issue and smoking an air quality matter, these would not rise to the level to be considered significant environmental impacts. However, these issues may be taken into account by the Planning Commission and other decision-makers as part of the project approval process.

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<sup>21</sup> Alice Barkley and Roseanne E; Sullivan, Memorandum to Stu During of During Associates, *Re: Review of Student Handbook regarding Student Conduct in the Neighborhood*, June 16, 2008.



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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

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This chapter identifies alternatives to the proposed project and discusses potential environmental impacts associated with each alternative. Project decision-makers could approve any of the following alternatives instead of the proposed project if the alternative is feasible, would reduce or eliminate any of the project's significant impacts, and would attain most of the project sponsor's objectives. The project decision-makers will determine the feasibility based on substantial evidence in the record, which shall include, but not be limited to, information presented in this Draft EIR and comments received on it.

Alternatives were selected that would reduce the identified impacts of the proposed project. The existing building at 1831-1835 Broderick Street, proposed for demolition, retains integrity of location, design, setting, feeling and association and is a contributor to the surrounding district. The proposed project would result in a significant and unavoidable cultural resources impact to the built environment of the project neighborhood. The impact would be because of the removal of a contributory building to a potential historic district and the introduction of a new building that is not consistent with the fenestration pattern, scale, form, materials, and design of existing contributing potential historic district buildings. The alternatives include the following:

- Under the CEQA-required No-Project Alternative, there would be no change on the project site and no environmental impacts.
- Under the Preservation Alternative, the existing historic building on the southern portion of the site (1831-1835 Broderick Street) would be adaptively reused as an addition to the Drew School in compliance with the Secretary of the Interior's standards. This alternative would provide additional classroom space but, due to the narrow width and other constraints of the existing building, would not include a new assembly/theater.
- The Partial Preservation Alternative would retain the front 15 feet of the existing building volume of 1831-1835 Broderick Street, while the remainder of the existing building would be demolished and replaced by a new building containing an assembly room/theater and additional classroom space.
- Under the Residential Design Guidelines Alternative, the existing historic building (1831-1835 Broderick Street) on Lot 3 would be demolished, and an addition to the Drew School containing an assembly room/theater and additional classroom space would be constructed with a façade that is consistent with the Residential Design Guidelines (Section 311 of the Planning Code). The design of the proposed project "would be responsive to the overall neighborhood context, in

order to preserve the exiting visual character." (Residential Design Guidelines, page 7) These Guidelines "do not mandate specific architectural styles, nor do they encourage direct-imitation of the past." (Residential Design Guidelines, page 6).

Figures 15, 16, and 17, pages 81 to 83, illustrate the massing of the alternatives compared to the proposed project.

## A. ALTERNATIVE A: NO PROJECT

CEQA and the State CEQA Guidelines require EIRs to include a No Project Alternative so that decision-makers can compare the effects of the proposed project with the effects of not approving a project.

### DESCRIPTION

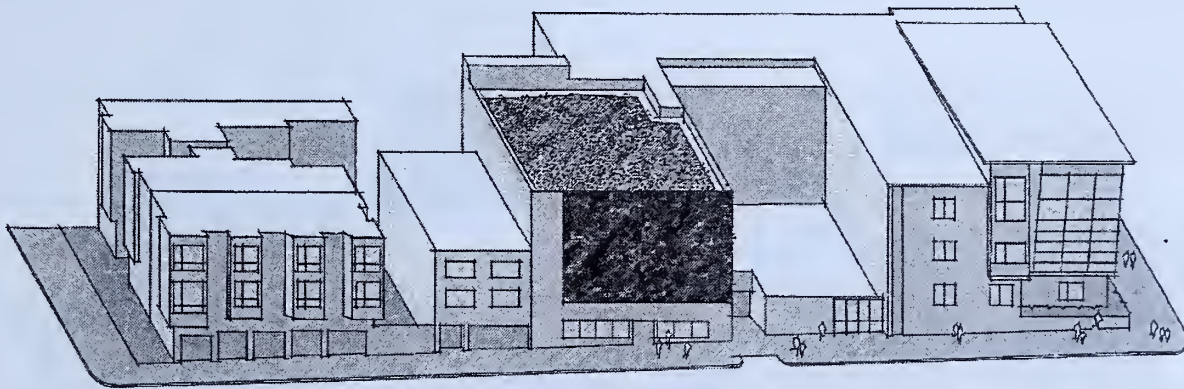
Alternative A, the No Project Alternative, would not change the project site conditions. The existing 45-foot-tall, three-story-over-basement residential building at 1831-1835 Broderick Street and the existing Drew School building in its current configuration on the site would remain (see Figure 15, page 81). The proposed three-story-over-basement, 40-foot-tall, approximately 15,604-square-foot addition to the Drew School would not be constructed. The social hall of the nearby Seventh Day Adventist Church (2889 California Street, at the southeast corner of Broderick and California Streets) would continue to be used for Drew School assembly functions, when available. This alternative would not preclude future proposals for redevelopment of the project site.

### IMPACTS

If the No-Project Alternative were implemented, none of the proposed project's impacts discussed in Chapter III, Environmental Setting and Impacts, or in the Initial Study would occur, and none of the mitigation measures would be required. The following project impacts would be avoided:

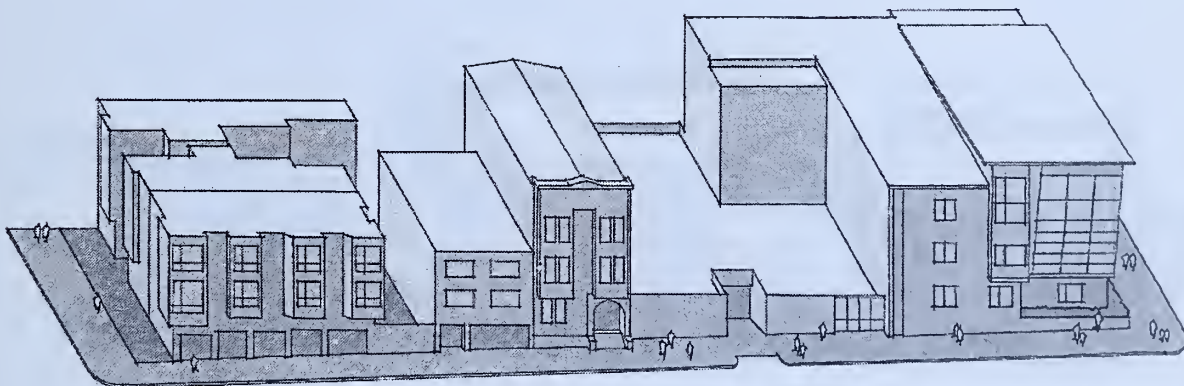
- The demolition of the existing three-story-over-basement building at 1831-1835 Broderick Street, constructed in 1891 and an historic resource, would not occur.
- The project's greenhouse gas emissions would be avoided.
- The proposed project's less-than-significant transportation impacts and air quality impacts on intersections would be avoided.
- The proposed project's less-than-significant shadow impact would not occur.





**Proposed Project**

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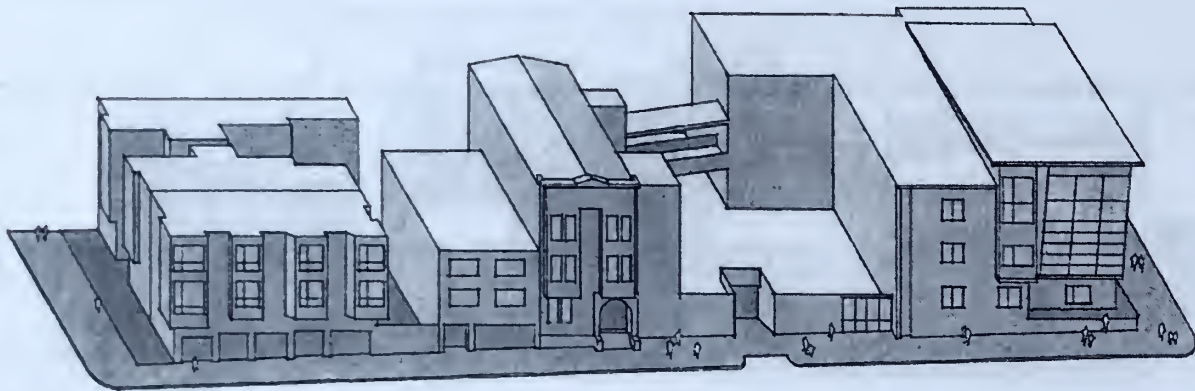


**Alternative A — No Project**

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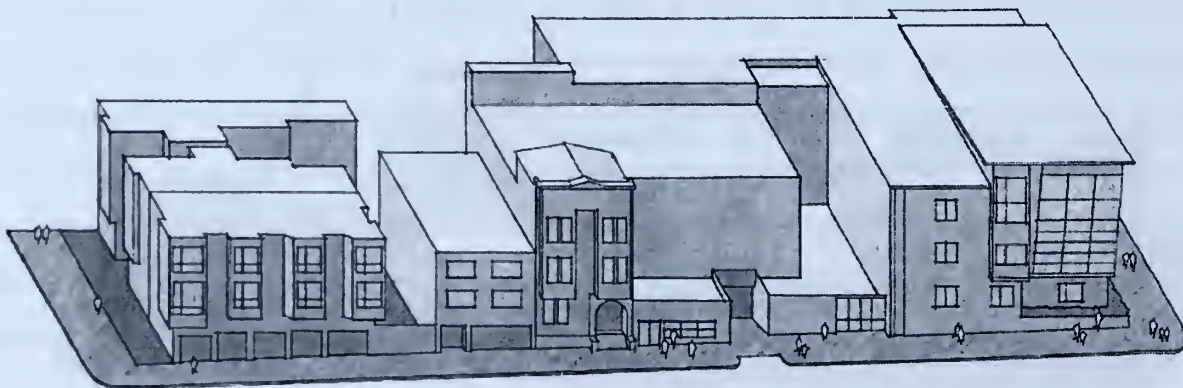
Source: Roma Design Group  
9-19-08

**Drew School Massing Diagrams Figure 15**



Alternative B — Preservation Alternative

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Alternative C — Partial Preservation Alternative

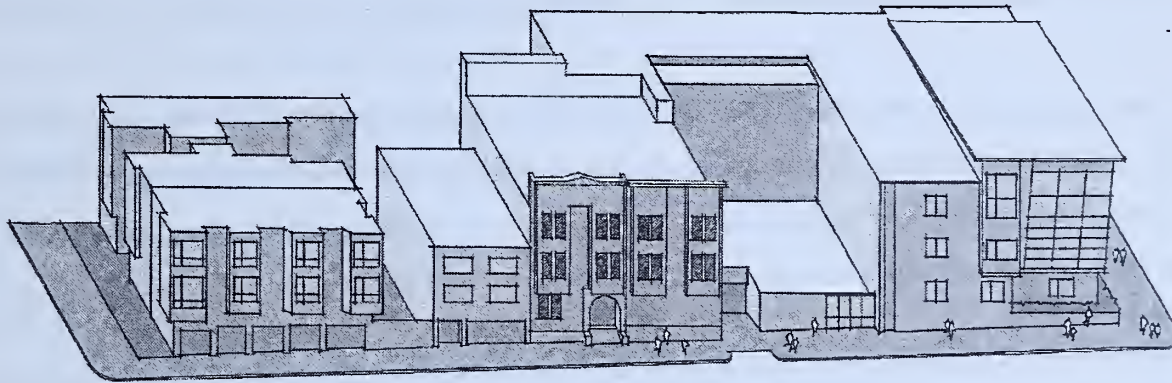
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Source: Roma Design Group

9/19/08

Drew School Massing Diagrams Figure 16





Alternative D — Residential Guidelines Alternative

Source: Roma Design Group

9-19-08

Drew School Massing Diagrams Figure 17

There would be no construction-related noise, air quality, or transportation impacts because no construction would occur.

- The potential exposure to hazardous materials during building demolition would be avoided.
- Potential archeological resources would not be affected because there would be no excavation on the site.

Other less-than-significant effects described in the Initial Study (see Appendix A) would not occur with this alternative, including those in the areas of land use and land use planning, aesthetics, population and housing, noise, wind, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agriculture resources.

The No Project Alternative would not meet the project sponsor's objectives as follows, while remaining in residential use:

- Provide an assembly room/theater, rehearsal space, and additional classrooms for the Drew School necessary to provide an quality and expanded educational opportunities in drama, music, and the arts (the social hall of the nearby church has insufficient capacity for both concert/recital and drama presentations, and is sometimes unavailable to the Drew School due to its use for church functions on evenings and weekends);
- Promote environmental consciousness by integrating green building design principles into construction of the new Assembly Wing, including a green "living wall" facing Broderick Street;
- Expand the student population in order to provide additional educational opportunities; and
- Complete the project on schedule and within budget.

If the Planning Commission selected this alternative, and the project sponsor submits a different development proposal in the future, that proposal would be subject to a separate project-specific CEQA environmental review.

## **B. ALTERNATIVE B: PRESERVATION ALTERNATIVE**

### **DESCRIPTION**

Under Alternative B, the Preservation Alternative, the existing historic building on Lot 3 (1831-1835 Broderick Street) would be rehabilitated and reused as part of an expanded Drew School campus in compliance with the Secretary of the Interior's standards (see Figure 16, page 82).

This alternative would not include the assembly room/theater, associated rehearsal space, tech gallery, scenery loft, and green room (staging/rehearsal room) due to the narrowness and other constraints of the existing building..



As presented, there would be exterior connections and ADA stairways and ramps. Elevators for ADA access would be placed in shafts adjoining the historic building. These accessibility strategies may not be in compliance with the Secretary of the Interior's Standards, and may detract from an historic district.

This alternative would only provide additional classroom space and restrooms.<sup>22</sup> The social hall of the nearby Seventh Day Adventist Church (2889 California Street, at the southeast corner of Broderick and California Streets) would continue to be used for Drew School assembly functions, when available. The rehabilitated structure at 1831-1835 Broderick Street would provide additional classroom space and restrooms.

## IMPACTS

Compared to the proposed project, the Preservation Alternative would have the following impacts:

- This alternative would avoid the significant unavoidable project-specific and cumulative impact on historic resources caused by the proposed project's demolition of the existing 1831-1835 Broderick Street historic resource building.
- This alternative would avoid the proposed project's aesthetic impacts.

Since this alternative has similar land uses as the proposed project, it would have similar less-than-significant land use impacts. It would not physically divide an established community, conflict with adopted land use plans, or substantially or adversely alter the vicinity's land use character. Since it would include demolition and construction, this alternative's archeology, construction air quality, and hazardous materials impacts would be the same or lower than those of the proposed project and would require implementation of the mitigation measures identified in Chapter IV, Mitigation and Improvement Measures, page 67, except Mitigation Measures 1, 2, and 3, Historical Architecture. Since it would be similar but of a smaller size, this alternative would have impacts similar to or less than the proposed project's less-than-significant impacts identified by the Initial Study in the areas of population and housing, transportation, noise, air quality (other than construction emissions), wind, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agricultural resources.

This alternative could accommodate additional classrooms but not assembly room/performance space. This alternative would not meet the project sponsor's objectives to:

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<sup>22</sup> Converting space in the existing building to theater space was rejected by the project sponsor because it would eliminate existing classroom space. Construction of theater space in the courtyard was rejected by the project sponsor because it would eliminate the usable open space of the school and the natural light to nine existing classrooms, which could interfere with the school's objective to achieve LEED certification for the project.

- Provide an assembly room/theater, rehearsal space, and additional classrooms for the Drew School to support programs in drama, music, and the arts (the social hall of the nearby church has insufficient capacity for both concert/recital and drama presentations, and is sometimes unavailable to the Drew School due to its use for church functions on evenings and weekends);
- Integrate green building design principles into construction of the new Assembly Wing, including a green "living wall" facing Broderick Street;
- Provide an expanded campus that will be interconnected;
- Design a new building consistent with the existing neighborhood character of the area;
- Expand the student population in order to provide additional educational opportunities; and
- Complete the project on schedule and within budget.

However, this alternative would meet the other objectives of the project sponsor to provide additional classrooms for the Drew School.

## **C. ALTERNATIVE C: PARTIAL PRESERVATION ALTERNATIVE**

### **DESCRIPTION**

Under Alternative C, the Partial Preservation Alternative, the first 15 feet of the volume of the 1831-1835 Broderick Street building would be retained. This alternative would demolish the remainder of the existing building behind the façade and the first 15 feet, and replace the demolished portion of the existing building and a portion of the existing courtyard with a new building containing an assembly room/theater and additional classroom space. As presented, the theater would not fill the full void of the rear portion of the building removed, thus breaking the spatial relationships and massing which are character-defining features of the Broderick building as a contributor to the historic district.

### **IMPACTS**

Compared to the proposed project, the Partial Preservation Alternative would have the following impacts:

- Retention of first 15 feet of the front of the existing 1831-1835 Broderick Street building would avoid, to some degree, the significant and unmitigated effect on historic resources that would occur with implementation of the proposed project. The building as seen from the street would be preserved.

Since this alternative would be similar to, but of a smaller size than, the proposed project, this transportation impacts would be less than significant, similar to the proposed project. The visual character and scenic public views or vistas impacts would be less-than-significant, similar to the



proposed project. This alternative has similar land uses as the proposed project and would have similar less-than-significant land use impacts. It would not physically divide an established community, conflict with adopted land use plans, or substantially or adversely alter the vicinity's land use character. This alternative's archeology, construction air quality, and hazardous materials impacts would be the same or less than those of the proposed project, and would require implementation of the mitigation measures identified in Chapter IV, Mitigation and Improvement Measures, page 67. This alternative would have impacts similar to or less than the proposed project's less-than-significant impacts identified by the Initial Study in the following areas: population and housing, noise, air quality (other than construction emissions), wind, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agricultural resources.

The Partial Preservation Alternative would meet some of the project sponsor's objectives, including:

- Provide an assembly room/theater, rehearsal space, and additional classrooms for the Drew School;
- A building consistent with the existing neighborhood character of the area;
- Expand the student population in order to provide additional educational opportunities; and
- Complete the project on schedule and within budget.

This alternative would not provide a green "living wall" facing Broderick Street, and it would interfere with flexibility of use. Under this alternative, the size of the existing courtyard would be reduced, and the configuration of windows may not meet the daylighting requirements of LEED.

## **D. ALTERNATIVE D: RESIDENTIAL GUIDELINES ALTERNATIVE**

### **DESCRIPTION**

Under Alternative D, the Residential Guidelines Alternative, the existing historic building on Lot 3 (1831-1835 Broderick Street) would be demolished, and an addition to the Drew School containing an assembly room/theater and additional classroom space would be constructed in conformity with the Residential Design Guidelines (see Figure 17, page 83).

The façade of the addition would be compatible with the scale and rhythm of the older residential buildings in the vicinity.

## IMPACTS

Compared to the proposed project, the Residential Guidelines Alternative would have the following impacts:

- This alternative would have a significant and unavoidable impact on historic architectural resources similar to the proposed project due to the demolition of the existing historic 1831-1835 Broderick Street building, but would partially avoid the impact to historical architectural resources.

The transportation impacts of this alternative would be similar to the proposed project, and, like the proposed project, would be less than significant. This alternative, similar to the proposed project, would have less-than-significant impacts on the visual character and scenic public views or vistas. This alternative has similar land uses as the proposed project, and would have similar less-than-significant land use impacts. It would not physically divide an established community, conflict with adopted land use plans, or substantially or adversely alter the vicinity's land use character. This alternative's archeology, construction air quality, and hazardous materials impacts would be similar to those of the proposed project and would require implementation of the mitigation measures identified in Chapter IV, Mitigation and Improvement Measures, page 67.

This alternative would have impacts similar to the proposed project's less-than-significant impacts identified by the Initial Study in the following areas: population and housing, noise, air quality (other than construction emissions), wind, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agricultural resources.

As presented, this alternative's façade would be less visually consistent with the existing Drew School than the proposed project. This alternative would meet the other objectives of the project sponsor to provide an assembly room/theater, rehearsal space, and additional classrooms for the Drew School; to design a building compatible with the existing neighborhood character of the area; to provide and enhance additional educational opportunities; and to complete the project on schedule and within budget.

This alternative would partially avoid the impact to historical architectural resources and would be the environmentally superior alternative.



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## VII. EIR AUTHORS, PROJECT SPONSOR'S TEAM, AND PERSONS CONSULTED

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## **VIII. APPENDICES**

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Appendix A: Initial Study

Appendix B: Conditions of Approval

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## Appendix A

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### Initial Study

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# SAN FRANCISCO PLANNING DEPARTMENT

## NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

<b>Date of Publication:</b>	March 8, 2008
<b>Lead Agency:</b>	Planning Department, City and County of San Francisco 1650 Mission Street, Suite 400, San Francisco, CA 94103
<b>Agency Contact Person:</b>	Leigh Kienker <b>Telephone:</b> (415) 575-9036
<b>Project Title:</b>	2007.0128E: Drew School Addition
<b>Project Sponsor:</b>	Drew School
<b>Project Contact Person:</b>	Alice Suet Yee Barkley/Denis F. Shanagher <b>Telephone:</b> (415) 356-4635
<b>Project Address:</b>	2901 California Street and 1831-1835 Broderick Street
<b>Assessor's Block(s) and Lot(s):</b>	Block 1029, Lots 3 and 95
<b>City and County:</b>	San Francisco

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Information:  
**415.558.6377**

**Project Description:** The project would demolish an existing 40-foot-tall, three-story-over-basement residential building at 1831-1835 Broderick Street (Assessor's block 1029, Lot 3) in the Lower Pacific Heights area of San Francisco, and construct a three-story-over-basement, 40-foot-tall addition to the existing Drew School building at 2901 California Street (Assessor's Block 1029, Lot 95). There would be about a 15 percent increase in school population or enrollment (from about 243 students to approximately 280). The project would add approximately 15,604 square feet (sq.ft.) to the existing 26,470-square-foot Drew School building for an assembly room/theater, rehearsal space, and classrooms. The entrance to the theater/assembly space would be off the courtyard, connecting the new and existing buildings. The existing 21-space basement/underground parking garage would not change. The project would employ green design principles and be LEED Gold Certified. The existing building at 1831-1835 Broderick Street was constructed in 1891, prior to the 1906 earthquake and fire, and may be considered an historical resource for CEQA purposes. The 18,000-square-foot project site is located on the west side of Broderick Street, between California and Pine Streets. The project would require amendment of an existing Conditional Use authorization (under *Planning Code* Section 303) to construct a school facility in a residential district (*Planning Code* Section 209.3(h)), discretionary review of demolition of residential units, a variance (under *Planning Code* Section 305) from the rear yard requirement (*Planning Code* Section 134(a)(2)), issuance of demolition and building permits by the Department of Building Inspection (DBI); approval of a parcel map merging Lots 3 and 95 and ancillary street and sidewalk permit during construction by the Bureau of Streets and Mapping of the Department of Public Works, and approval by the Department of Parking and Traffic for any curb or road modifications. The project site is within the Residential, Mixed, Low Density (RM-1) zoning district and 40-X height and bulk district.

**Building Permit Application Number(s), if Applicable:** N/A

**THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED.** This determination is based upon the criteria of the State CEQA Guidelines, Section 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Written comments on the scope of the EIR will be accepted until the close of business on April 7, 2008. Written comments should be sent to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

**State Agencies.** We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

*March 8, 2008*

Date

*Bill Wycko*

Bill Wycko, Acting Environmental Review Officer





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# INITIAL STUDY

## Case Number 2007.0128E – Drew School Addition

### A. PROJECT DESCRIPTION

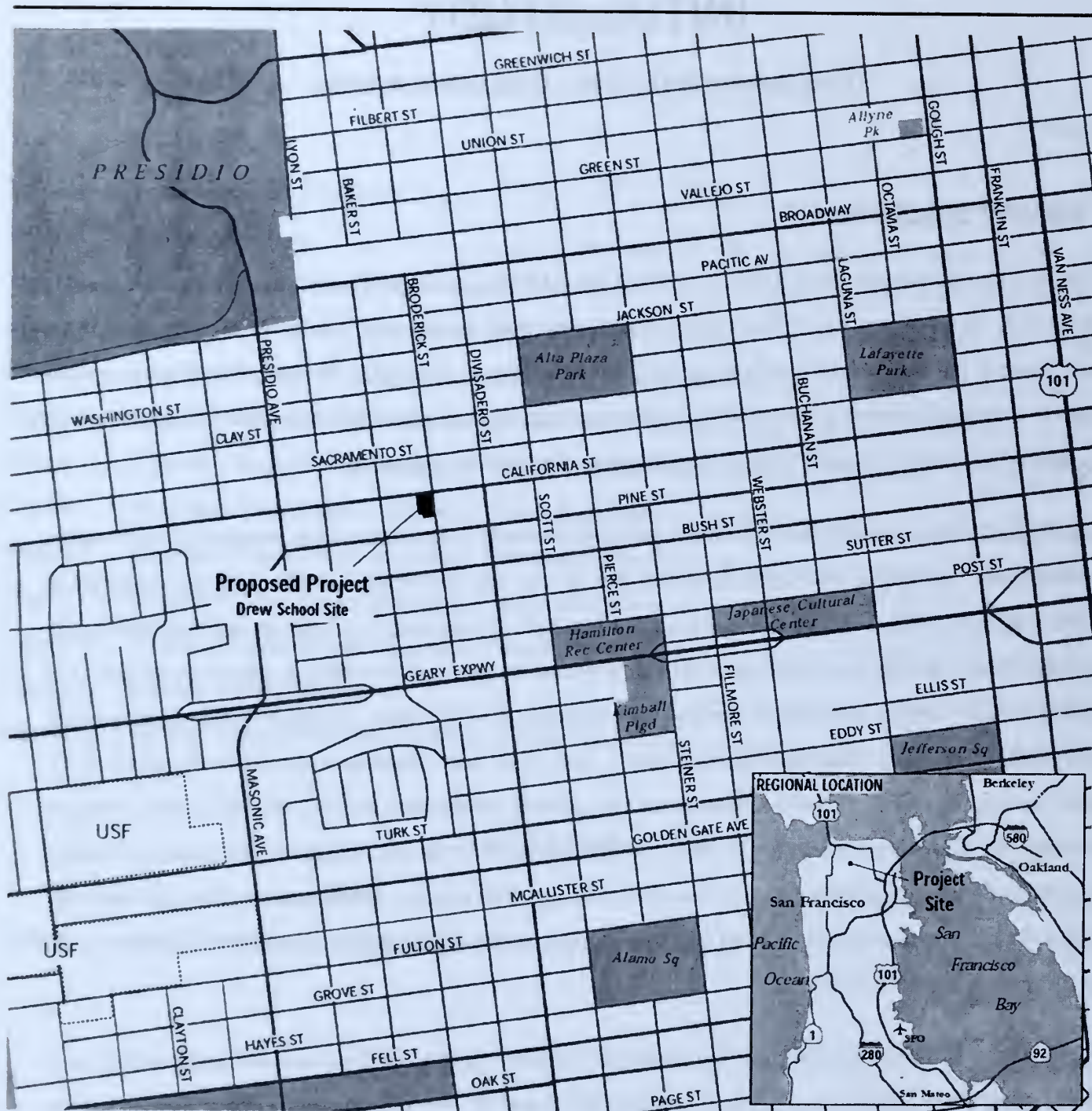
The project site (Assessor's Block 1029, Lots 3 and 95) is located in Lower Pacific Heights, on the west side of Broderick Street, in the block bounded by Broderick Street to the east, California Street to the north, Baker Street to the west, and Pine Street to the south (see Figure 1, page 2). The purpose of the proposed project is to provide assembly room/performance space and additional classrooms. Drew School acquired the adjacent building in August 2004 to accommodate this facility expansion.

The proposed project would demolish the existing 40-foot-tall, 5,225-square-foot residential, three-story-over-basement, building at 1831-1835 Broderick Street, that was constructed in 1891 and is considered an historic resource. A three-story-over-basement, 40-foot-tall, approximately 15,604-square-foot addition to the Drew School would be constructed on the site and on part of the existing school courtyard. The addition would contain additional classrooms, assembly room/theater, rehearsal space, tech gallery, scenery loft, green room (staging/rehearsal room), restrooms, and circulation space (see Figures 2 to 11, pages 3 to 12). The existing 26,470-square-foot Drew School (established in 1911) would contain a total of approximately 42,074 square feet (sq.ft.) after completion of the proposed addition. The existing 21-space basement/underground parking garage would not change. The existing enrollment of about 243 students and 52 full and part-time faculty would increase to a maximum of 280 students and three additional staff (and increase of about 15 percent).

The proposed addition would occupy Lot 3 and the southern portion of the courtyard and parking level of the existing Drew School (see Figures 2 and 3, pages 3 and 4). The addition would have a green "living wall" facing Broderick Street that would be covered with vegetation to promote habitat preservation. The project would include a roof design that utilizes vegetation and highly reflective surfaces (see Figure 8, page 10). The proposed building would be LEED certified (certified by the Leadership in Energy and Environmental Design green building rating system).

The basement level of the addition would have approximately 5,191 sq.ft. that would contain two classrooms, a rehearsal space, restrooms, and circulation space. The ground level would have about 5,312 sq.ft. that would contain an assembly room/theater and a green room (staging/rehearsal room). The



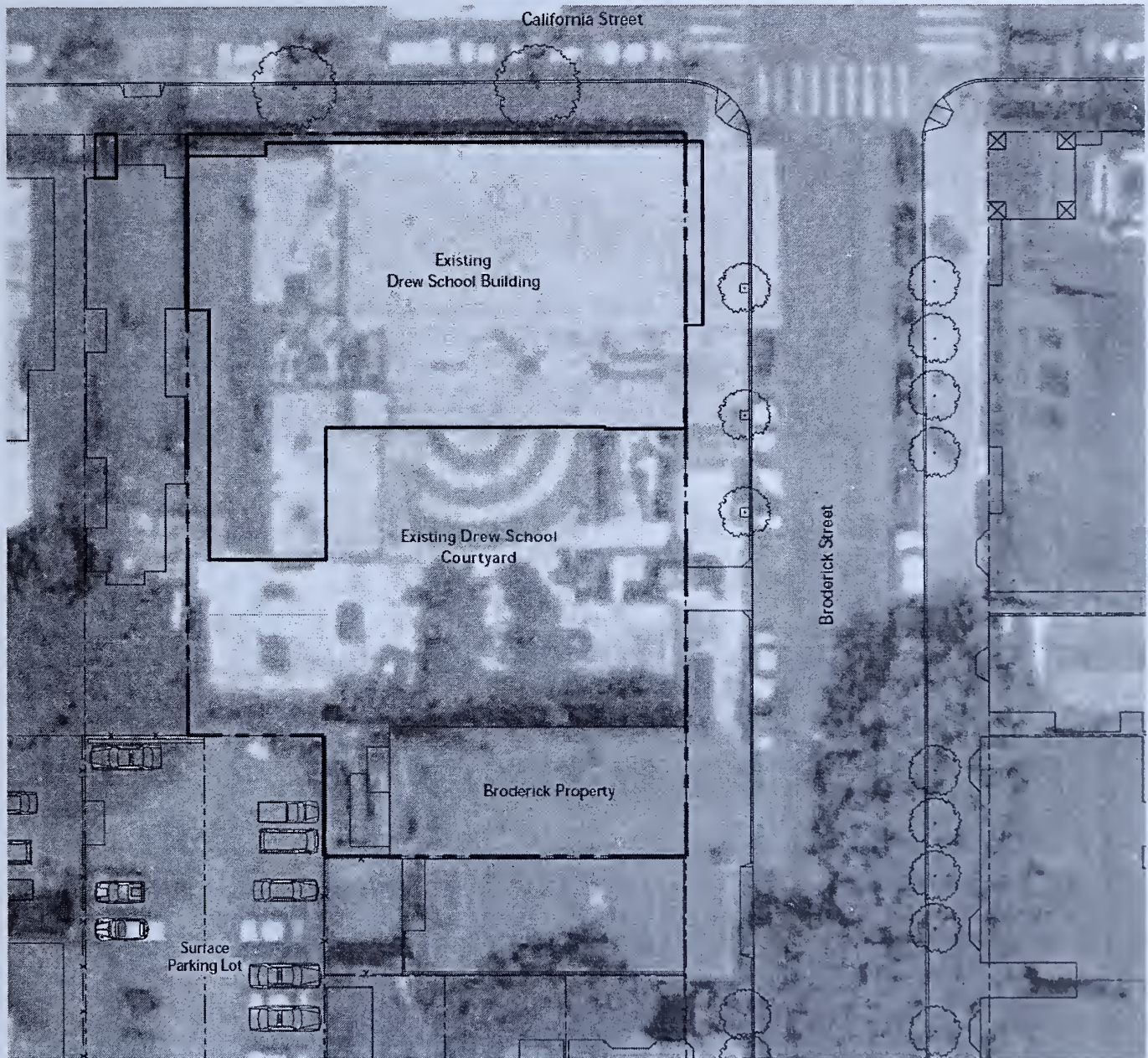


0 1500 ft (APPROXIMATE)

Source: Daring Associates  
11-29-07

Proposed Project Location Figure 1



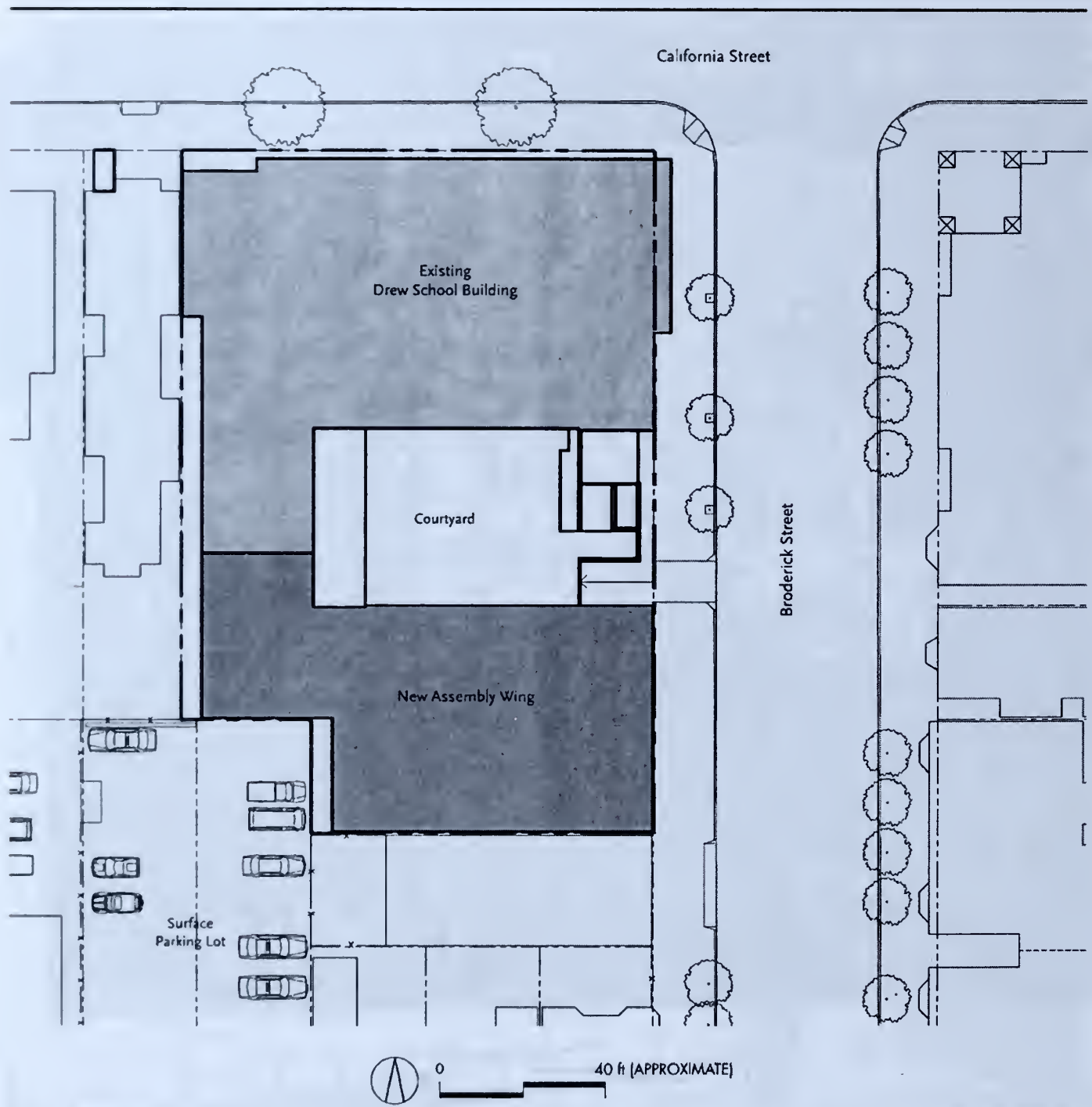


Source: Roma Design Group

2.20.08

Existing Site Plan Figure 2



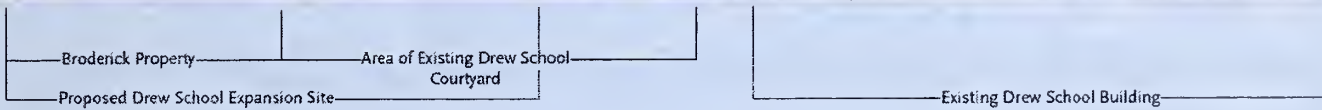


Source: Roma Design Group

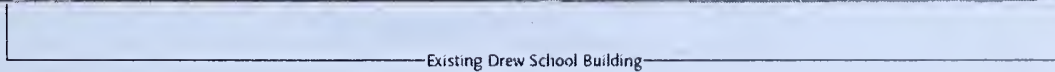
1 31 08

**Proposed Drew School Expansion Site Plan Figure 3**





Broderick Street

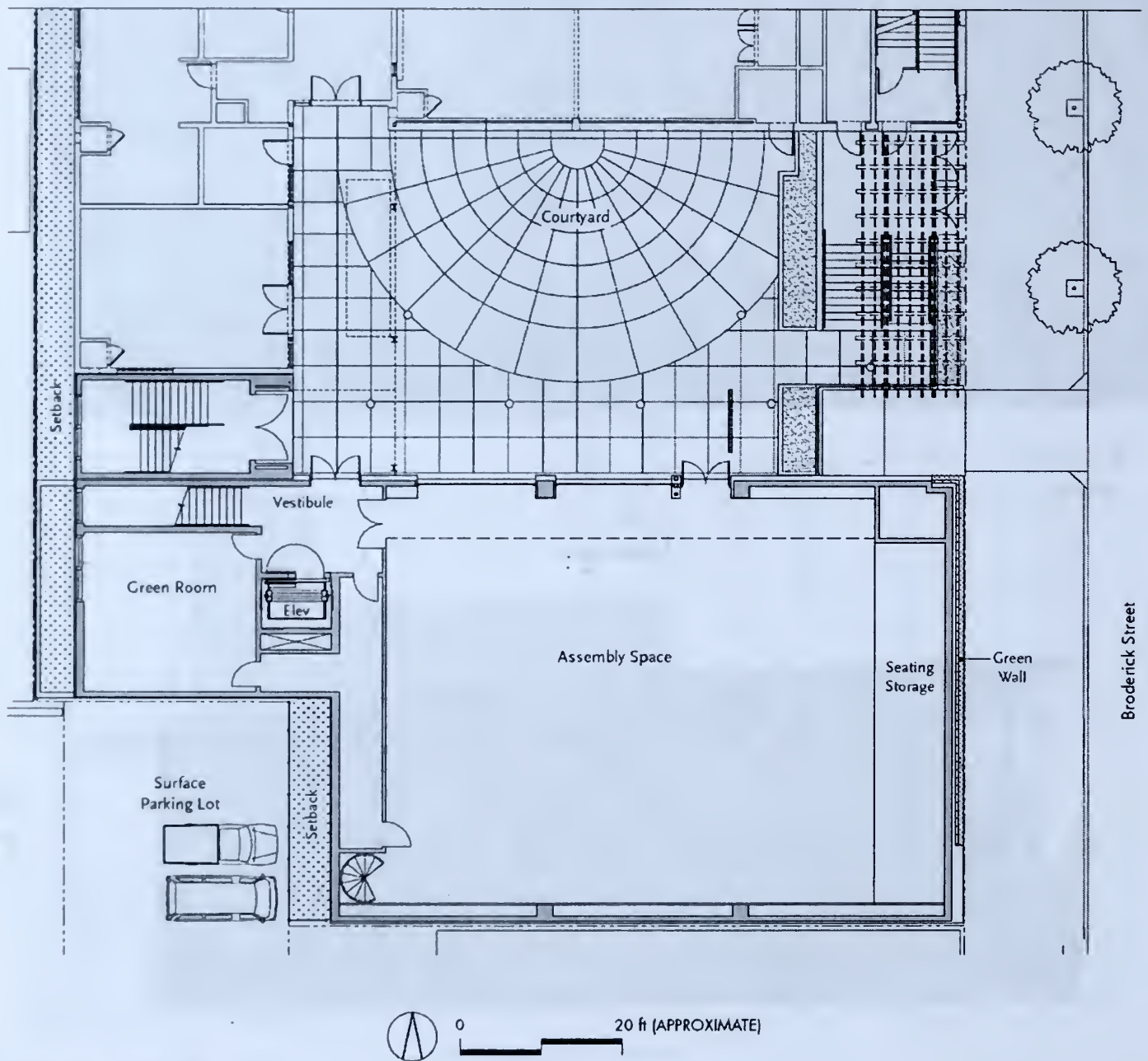


California Street

Source: Roma Design Group

3-3-08

Proposed Expansion Site and Existing Drew School Photos Figure 4

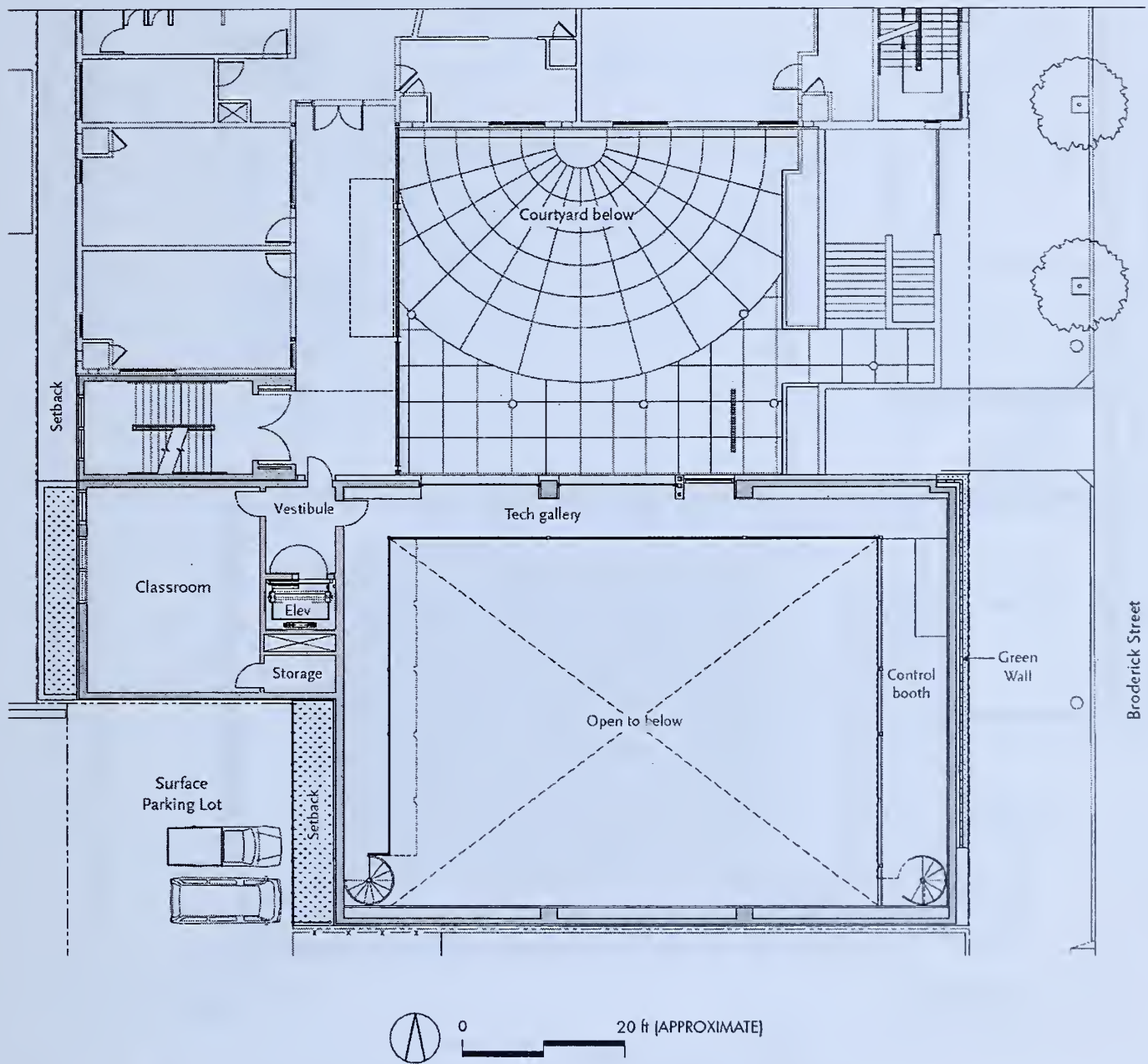


Source: Roma Design Group

21-08

Proposed Drew School Expansion Courtyard Level Floor Plan Figure 5



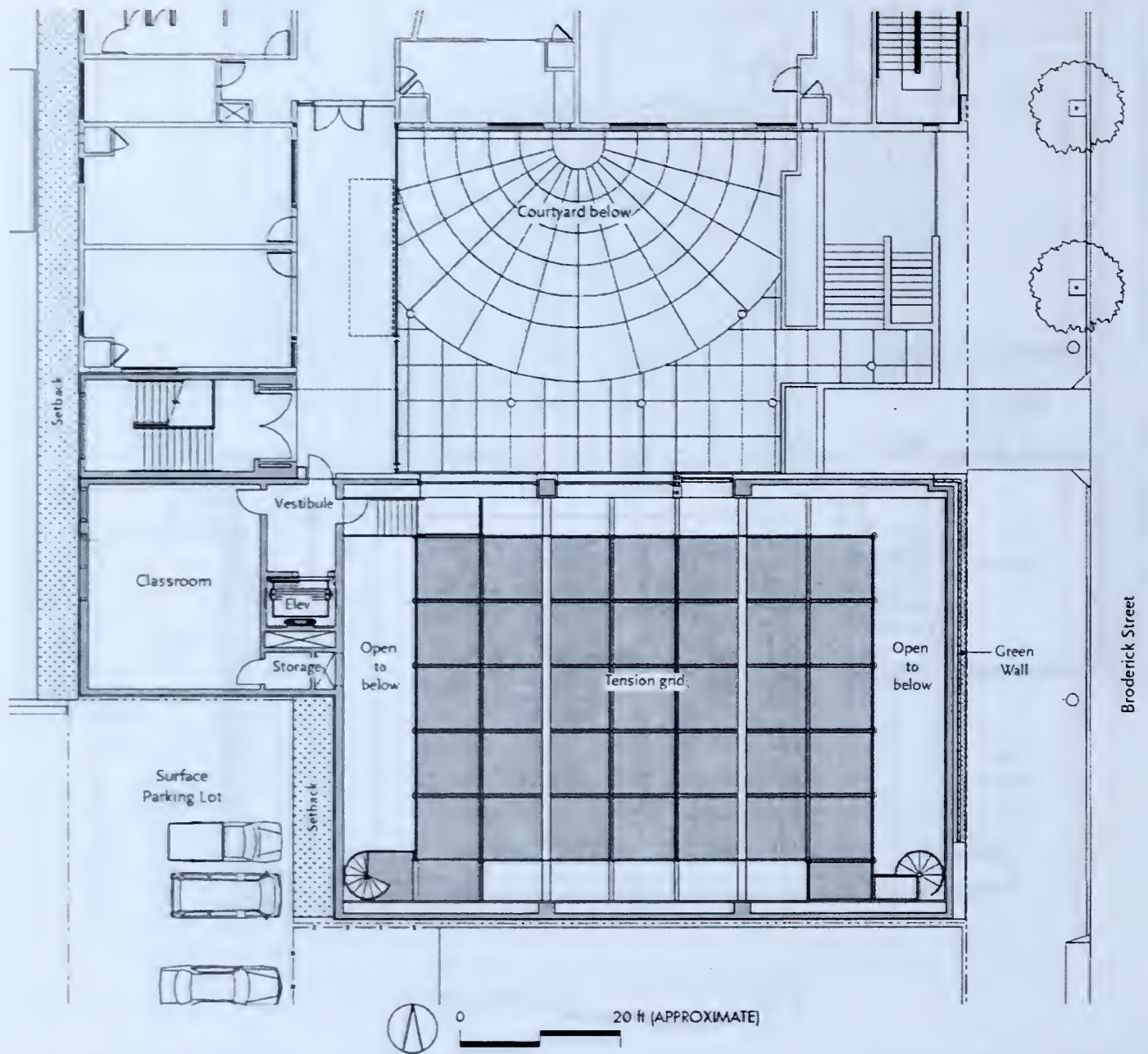


Source: Roma Design Group

2-1-08

Proposed Drew School Expansion Second Floor Plan Figure 6

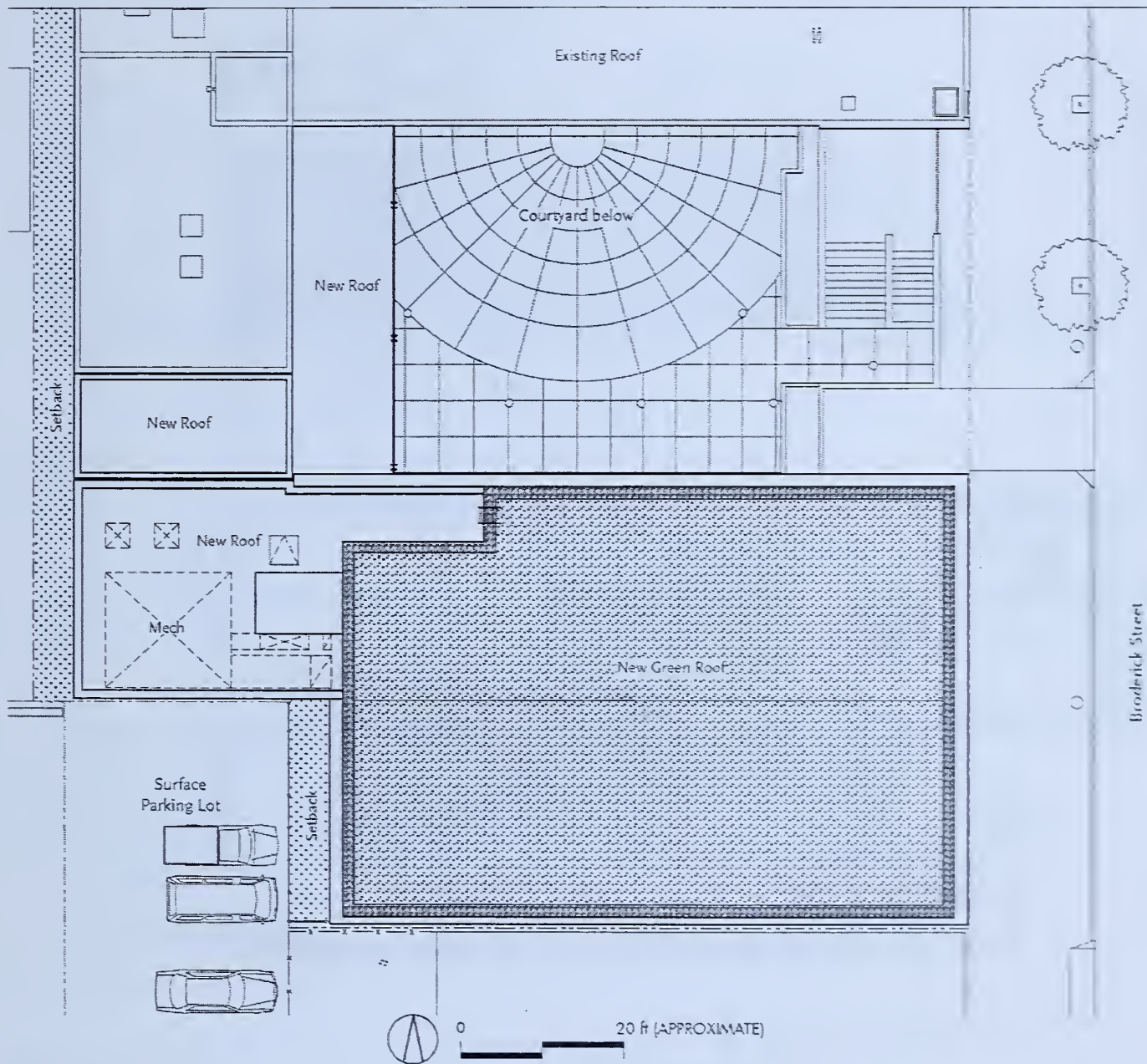




Source: Roma Design Group

2.1.08

Proposed Drew School Expansion Third Floor Plan Figure 7

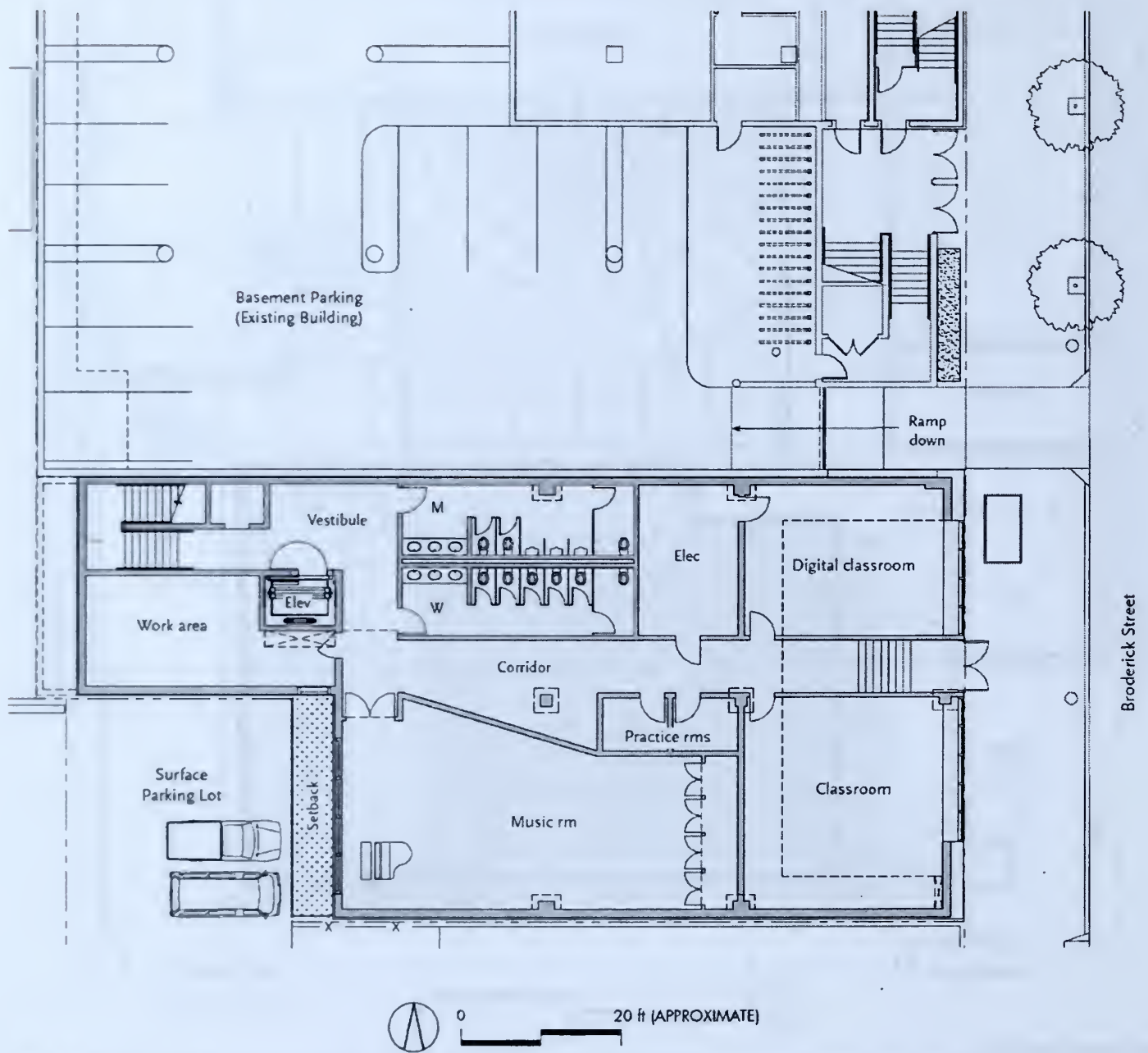


Source: Roma Design Group

2-1-08

Proposed Drew School Expansion Green Roof Plan Figure 8

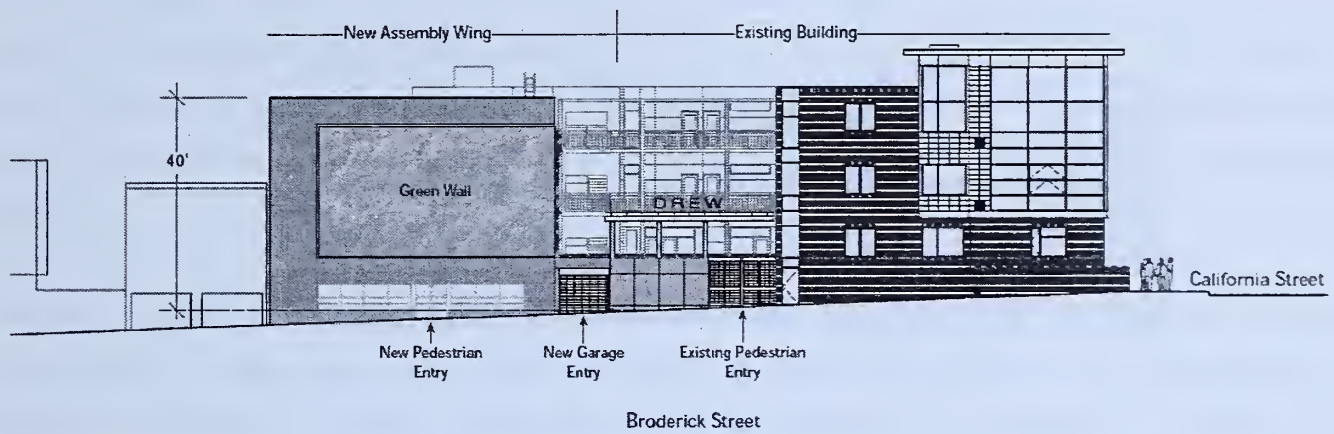




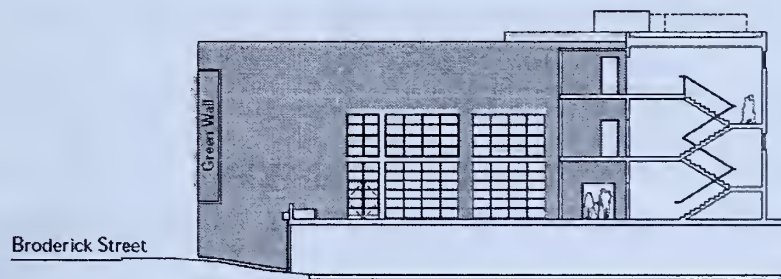
Source: Roma Design Group

1/29/08

Proposed Drew School Expansion Basement Floor Plan Figure 9



East Elevation



North Elevation

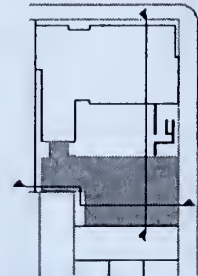
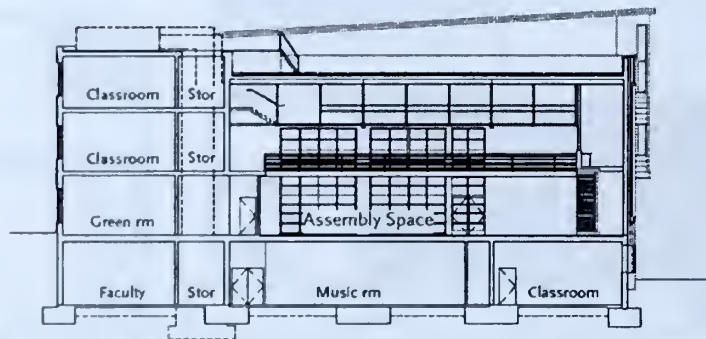
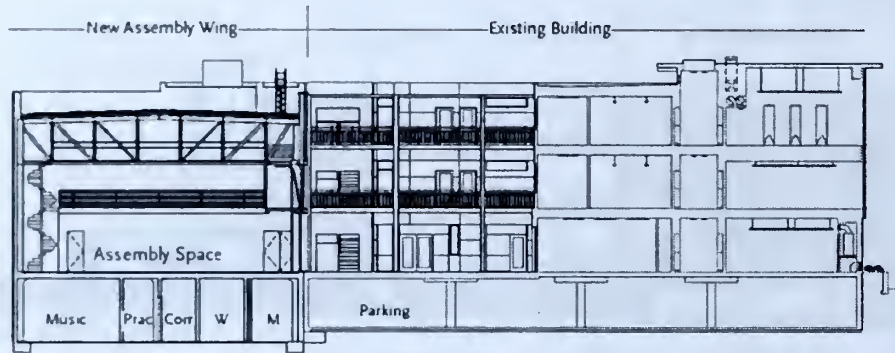
0 40 ft (APPROXIMATE)

Source: Roma Design Group

2.6.08

Proposed Drew School Expansion Project Elevations Figure 10





0 40 ft (APPROXIMATE)

Source: Roma Design Group

1:29 (ft)

Proposed Drew School Expansion Project Sections Figure 11

second level would contain approximately 2,359 sq.ft. that includes the upper volume of the assembly/theater, a tech gallery and classroom. The third level would have about 2,742 sq.ft. that would contain the upper volume of the assembly space, a classroom, circulation space, and a scenery loft. There would be approximately 2,300 sq.ft. of usable open space in the courtyard for students and employees. The entrance to the theater/assembly space would be off the courtyard. The main entrance to the school would continue to be on California Street. There would be an entrance to the basement level on Broderick Street.

There are three street trees along the Broderick Street frontage, and two street trees along the California Street frontage. One or more of the street trees along the Broderick Street frontage would be removed to facilitate construction and replaced after the addition is completed. Four evergreen elm trees in the courtyard level of the school, and thirteen white poplar trees at the edge of the courtyard, would be removed. No additional landscaping is planned.

The proposed project would require demolition of a pre-1906 earthquake residential Victorian building, acquired by the school in 2004. It contains three residential flats are intended to be vacant in June 2008.

The project's basement and foundation would require excavation to a depth of approximately 12 feet below the existing sidewalk. The basement foundation would be approximately two to three feet below the level of the existing garage. Approximately 29,000 cubic feet (1,074 cubic yards) of soil would be removed.

Project construction is estimated to take approximately 13 months and the estimated construction cost of the proposed project would be approximately \$4.5 million. The project sponsor is the Drew School.

## **B. PROJECT SETTING**

The project site consists of two lots: the 2,269-square-foot (0.05 acre) 1831-1835 Broderick Street lot on the southern end (Assessor's Block 1029, Lot 3) that contains a three-story, residential building (acquired by the school in 2004); and the 15,732-square-foot (0.36 acre) 2901 California Street lot (Lot 95 of Assessor's Block 1029) on the north end that contains the existing Drew School building, courtyard and basement parking garage. The project is located in Lower Pacific Heights on the west side of Broderick Street, in the block bounded by Broderick, California, Baker, and Pine Streets. The project site slopes gently downward to the south, at a slope of approximately five percent, with an elevation ranging from 167 to 170.5 feet (San Francisco City Datum).

South of Lot 3 are two three-story multi-family residential buildings (1825 Broderick Street and 1801 Broderick Street at the northwest corner of Broderick and Pine Streets).

Across the street to the east of the project site, on the southeast corner of Broderick and California Streets, is the three- to five-story Seventh-Day Adventist Church (2889 California Street) with an approximately 60-foot steeple. South of the church on the east side of Broderick Street are a two-story-over-basement two-unit residential building (1832-1834 Broderick Street) and a three-story multi-family residential building at the northeast corner of Broderick and Pine Streets (1816-1826 Broderick Street).

The project site vicinity (within one to two blocks) is a mixed-use area comprised of residential and non-residential land uses that include restaurant, retail, commercial, office, religious, educational, and parking uses. Non-residential uses are concentrated along California Street east of Broderick Street, with residential uses predominating elsewhere, including nearby Broderick and Pine Streets, and California Street west of Broderick Street. Most buildings are low (two to four stories) and, with the exception of the Drew School, date from the early twentieth century. The tallest buildings in the site vicinity are the aforementioned church (2889 California Street) and two seven-story multi-family residential buildings on the northeast corner of California and Broderick Streets and the southeast corner of California and Baker Streets (2890 California Street and 2999 California Street, respectively).

In contrast to the buildings west of Broderick Street, most of the buildings east of Broderick Street have non-residential uses on the ground floor (retail, commercial, restaurant, office) with residential uses on the upper floors. Broderick Street north of California Street is also occupied by two- to seven-story single- and multi-family residential buildings dating primarily from the early twentieth century.

Both sides of Pine Street to the east and west of Broderick Street are occupied by single- and multi-family residential buildings dating primarily from the early twentieth century, and ranging in height from two to four stories. On the north side of Pine Street west of Broderick is a paved surface parking area, accessed from Pine Street, that extends northward to the southwest corner of the existing Drew School (Lot 95) and the western boundary of the 1831-1835 Broderick Street site (Lot 3). The school leases approximately 11 spaces on the lot from the Seventh Day Adventist Church. There is no direct access from the school grounds to the parking lot.

Sensitive receptors include the students and employees of the existing Drew School; occupants of the residential buildings on Broderick Street adjacent to the project site to the south and opposite the project site to the east, and of the nearby residential buildings on the north side of Pine Street and the south side



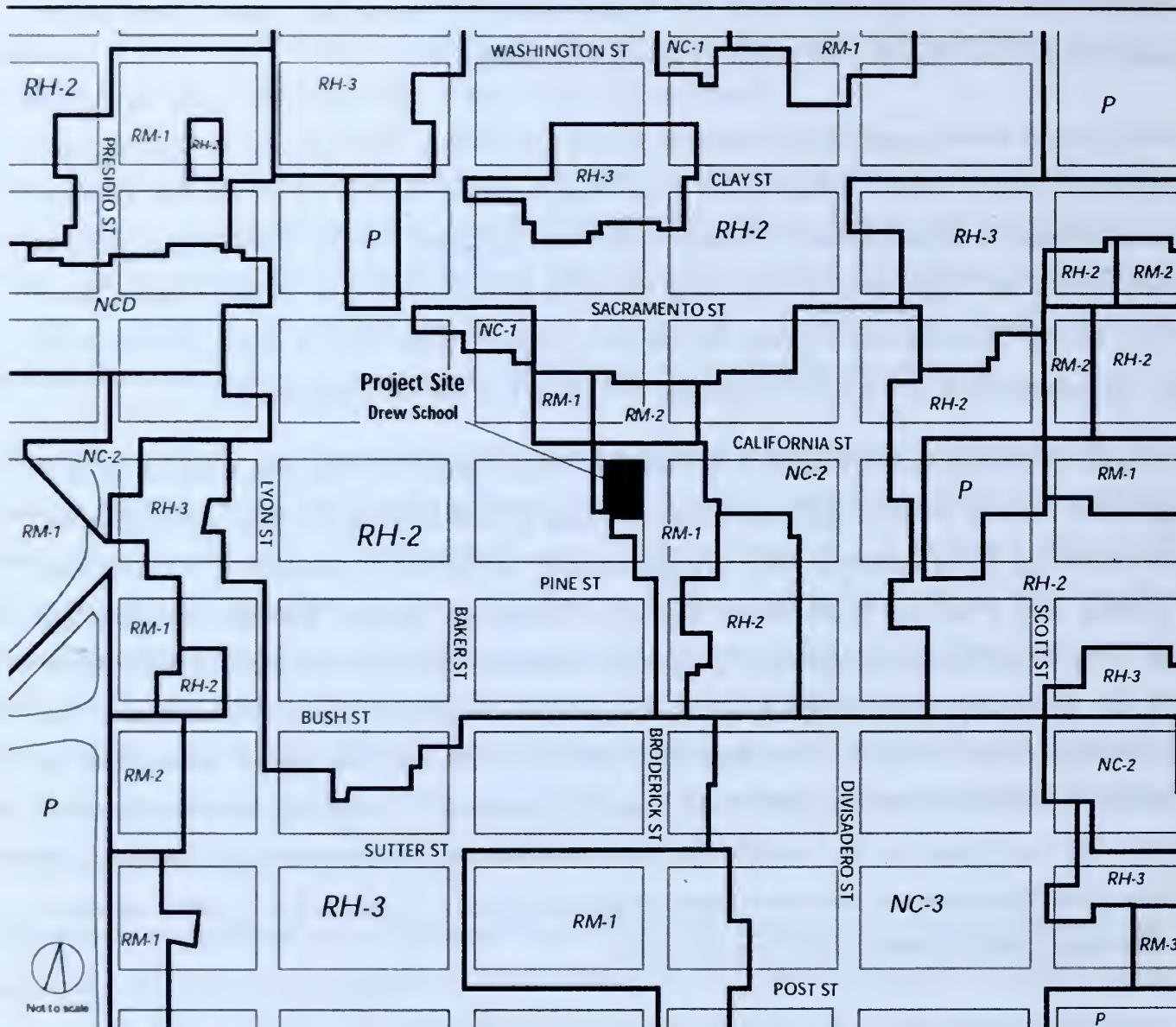
of California Street west of Broderick Street; and churchgoers to the Seventh Day Advent Church on the southeast corner of the California and Broderick streets intersection.

The zoning district of the project site is Residential, Mixed, Low Density (RM-1) and the surrounding area is a mixture of zoning districts, including RM-1 and Neighborhood Commercial Cluster (NC-1) to the northwest, Residential, Mixed, Moderate Density (RM-2) and Residential, House, Two-Family (RH-2) to the north; Small-Scale Neighborhood Commercial (NC-2) to the east; RH-2 to the southeast; RM-1 to the south, and RH-2 to the southwest and west. See Figure 12 on page 16 for a map of zoning districts in the vicinity. The project site is within a 40-X height and bulk district, as is the surrounding area.

Drew School has a pedestrian-only entrance on California Street. California Street, which runs in an east-west direction, has two lanes in each direction with parking on both sides, and 12-foot-wide sidewalks. The school frontage along California Street is approximately 180 feet and is currently in a 2-hour time limit parking area. Broderick Street, which runs in a north-south direction, provides the vehicular entrance to the school parking garage and a pedestrian entrance. In the vicinity of the school, Broderick Street is one travel lane in each direction with parking on both sides and 15-foot-wide sidewalks. The school frontage along Broderick Street between California Street and the garage access point is approximately 96 feet long and currently there is an approximately 75 feet long (sufficient for three vehicles) white zone closest to the garage access point and two 2-hour time limited spaces closest to California Street. Pine Street is a one-way westbound street, and in the vicinity of Drew School has three lanes with parking on both sides, and 12-foot sidewalks.

### C. COMPATIBILITY WITH ZONING, PLANS, AND POLICIES

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the <i>Planning Code</i> or Zoning Map, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>



Source: San Francisco Planning Department, During Associates

2 7 08

Existing Zoning Map Figure 12

## SAN FRANCISCO PLANNING CODE

The *San Francisco Planning Code (Planning Code)*, which incorporates the City's Zoning Maps, implements the *San Francisco General Plan (General Plan)* and governs permitted uses, densities, and configuration of buildings within the City. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless (1) the proposed project conforms to the *Planning Code*, (2) allowable exceptions are granted pursuant to provisions of the *Planning Code*, or (3) amendments to the *Planning Code* are included as part of the proposed project.

The project site is within the Residential, Mixed, Low Density (RM-1) zoning district and a 40-X height and bulk district. School facilities are a conditionally permitted use in a RM-1 district.

## APPROVALS

The proposed project would require the following approvals:

- Conditional Use authorization (under *Planning Code* Section 303) for a school use in a RM-1 district *Planning Code* Section 209.3(h)). This authorization would amend the 1999 Conditional Use authorization for the existing school and increase the enrollment from 250 to 280 students.
- Variance (under *Planning Code* Section 305) from the rear yard requirement to provide necessary assembly space in the new building. (*Planning Code* Section 134(a)(2)).
- Discretionary Review by the Planning Commission for demolition of the three residential units on the project site. (*Planning Code* Section 311).

The project would also require approval by the Department of Building Inspection (DBI) for demolition and site or building permits, and approval by the Bureau of Streets and Mapping of the Department of Public Works for a parcel map merging Lot 3 and Lot 95, and street and sidewalk permits. Any curb or road modifications would require approval by the Department of Parking and Traffic.

The 1999 Conditional Use authorization allowed the reconstruction and intensification of the existing school, including increased enrollment from 200 to 250; provision of a 21- to 23-space parking garage, and the creation of a passenger loading zone on Broderick Street.<sup>1</sup> All the conditions of the original

---

<sup>1</sup> Other conditions included prevention of student loitering in residential areas, containment of noise and light on school premises, prevention of double parking, encourage use of public transit and alternative means of transportation, appointment of a community liaison officer, provision of a traffic control monitor, and limitation of special evening and weekend events to two per month.



authorization would continue with the exception of the increase of enrollment to 280 students and the addition of the assembly wing.

## PLANS AND POLICIES

### San Francisco Plans and Policies

In addition to the *Planning Code* and zoning policies, development in the City is subject to the *General Plan*. The *General Plan* provides general policies and objectives to guide land use decisions. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section C, Evaluation of Environmental Effects. The compatibility of the proposed project with *General Plan* policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project. *General Plan* policies compatible with the proposed project include the following.

The proposed project would be consistent with Objectives 1, 2 11, 16, and 24 of the Transportation Element of the *General Plan*. The Drew School is located in a high-density infill area well served by public transit, and the school employs a bus service. In addition, those students who do come by car are predominantly in carpools that arrive at a City-permitted drop-off area on Broderick Street. The majority of students come to school either by foot or by transit. The school intends to dedicate one of their city-issued street parking permits to preferred parking for alternative fuel vehicles and is currently exploring the feasibility of alternative fuel vans. The "living wall" proposed on the California Street façade would be intended to enhance the pedestrian environment.

The proposed project would conform to Objectives 1 through 4 of the Urban Design Element. The proposed expansion would be built to the same height as the existing school and the existing residential structure on Broderick Street, reflecting the predominant building height in the project vicinity, and would not disturb any scenic views. The proposed expansion would be built to complement the design of the existing school, and as noted above, the proposed "living wall" would be intended to enhance the environment. Although the proposed expansion would reduce the size of its courtyard, the courtyard would continue to serve the school as onsite open space. The proposed expansion would also provide an assembly room/theater and rehearsal space.

The proposed project would generally comply with Objective 1 of the Commerce and Industry Element of the *General Plan*. It would expand the educational program of the school already in place, thus minimizing undesirable consequences, such as introduction of a new use.

The proposed project would comply with San Francisco's *Building Code*, thus minimizing the risk to property from natural disasters and reducing the risk of social, cultural, or economic dislocations, and complying with Objective 2 of the Community Safety Element of the *General Plan*.

The demolition of the residential structure at 1831-1835 Broderick Street would not conform to Objective 3 of the 1990 Residence Element (and Objective 2 of the 2004 Housing Element), which seeks to discourage demolition of sound residential structures.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the *City Planning Code* to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 13 a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and (8) protection of open space (Questions 8 a and b, Wind and Shadow, and Questions 9a and c, Recreation).

Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in the Evaluation of Environmental Effects, providing information for use in the case report for the proposed project. The case report and approval motions for the proposed project will contain the Department's comprehensive project analysis and findings regarding consistency of the proposed project with the Priority Policies.



The proposed project would not require an Institutional Master Plan, (*Planning Code* Section 204.5) because the requirement only applies to post-secondary schools. Drew School is a four-year secondary educational institution (grades 9 through 12).

## REGIONAL PLANS AND POLICIES

The five principal regional planning agencies and their over-arching policy-plans to guide planning in the nine-county bay area include the Association for Bay Area Governments' (ABAG) "*A Land Use Policy Framework*" and *Projections 2005*, the Bay Area Air Quality Management District's (BAAQMD's) *Clean Air Plan* and *Bay Area 2005 Ozone Strategy*, the Metropolitan Transportation Commission's *Regional Transportation Plan – Transportation 2030*, the San Francisco Regional Water Quality Control Board's *San Francisco Basin Plan*, and the San Francisco Bay Conservation and Development Commission's *San Francisco Bay Plan*. Due to the size of the proposed project, there would be no anticipated conflicts with regional plans.

## D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Land Use                       | <input checked="" type="checkbox"/> Air Quality        | <input type="checkbox"/> Geology and Soils                        |
| <input type="checkbox"/> Aesthetics                     | <input type="checkbox"/> Wind and Shadow               | <input type="checkbox"/> Hydrology and Water Quality              |
| <input type="checkbox"/> Population and Housing         | <input type="checkbox"/> Recreation                    | <input checked="" type="checkbox"/> Hazards/Hazardous Materials   |
| <input checked="" type="checkbox"/> Cultural Resources  | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mineral/Energy Resources                 |
| <input type="checkbox"/> Transportation and Circulation | <input type="checkbox"/> Public Services               | <input type="checkbox"/> Agricultural Resources                   |
| <input type="checkbox"/> Noise                          | <input type="checkbox"/> Biological Resources          | <input checked="" type="checkbox"/> Mandatory Findings of Signif. |

Except for the categories of historic architectural resources, the items on the Initial Study Environmental Evaluation Checklist have been checked "Less Than Significant with Mitigation Incorporated," "Less Than Significant Impact," or "No Impact," indicating that upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect. For the topics of historical architectural resources, where the conclusion is "Potentially Significant Impact," further analysis of the topic as well as of possible mitigation measures and alternatives will be included in the EIR. For all of the



items checked "Less Than Significant with Mitigation Incorporated," "Less Than Significant Impact," or "No Impact," the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department's *Transportation Impact Analysis Guidelines for Environmental Review*, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each checklist item, the evaluation has considered the impacts of the project both individually and cumulatively.

## E. EVALUATION OF ENVIRONMENTAL EFFECTS

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
1. LAND USE AND LAND USE PLANNING— Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial impact upon the existing character of the vicinity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Land use impacts are considered significant if the proposed project would physically divide an established community; conflict with any applicable land use plan, policy, or regulation; or if there would be a substantial impact upon the existing character of land uses in the vicinity.

The proposed project, which is an addition to the existing Drew School, would replace an existing three-story-over-basement residential building and a portion of the Drew School courtyard at the site with a three-story-over-basement expansion of the Drew School. The proposed project would be constructed within the existing lot boundaries. It would not interfere with or change the existing street plan or impede the passage of persons or vehicles. The proposed project would not change the area land uses or their intensity. Thus, the proposed project would not result in an impact to disrupt or divide the established neighborhood.

The proposed project would be consistent with all relevant plans, planning codes, and zoning. The *Planning Code* allows for granting CU authorization to expand the existing Drew School educational use to a residential site and granting the zoning variance from the rear yard provision requirements of the RM-1 district that the proposed project would require for Lot 3. The purpose of the rear yard requirements is to provide interior open space corridors in residential blocks. In order to provide the necessary assembly space for the school, the proposed project addition would change the existing building footprint on Lot 3 by expanding to approximately 8 ½ feet from the west property line and reducing the existing courtyard to the north. The project would include a connection from the existing school to the new assembly building that would be set back about five from the west property line (similar to the existing building). Although the project would not meet the *Planning Code* requirement for set back, there would still be open space similar to the existing conditions (see Figure 2, page 3).

## LAND USE CHARACTER

The proposed addition to the existing educational institution would expand the use and increase the enrollment by about 15 percent to 280 students. As part of the Drew School 1999 conditional use authorization, the enrollment was capped at 250 students.

The proposed project would expand the school facility but would be consistent with the mixed land use character of the area. The proposed addition would be similar in scale to the existing Drew School building on the project site. The proposed project would appear to, and would in fact, wrap the educational facility around the corner of the building, similar to California Street. While the proposed project would expand the current educational use to an additional lot, extending the use down Broderick Street an additional 25 percent of the block-face, an expansion of that size would not be substantial in the context of the neighborhood setting, nor adversely change the character of Broderick Street or that of surrounding land uses. The proposed project's impact on existing land use character would, therefore, not be considered a significant impact.

## CONCLUSION

The proposed project would expand the educational use on the project site, but would not physically divide an established community, nor conflict with adopted land use plans, nor substantially and adversely alter the land use character of the vicinity. Therefore, the proposed project's land use impacts would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The nearest vistas from public open spaces under the jurisdiction of the Recreation and Park Department are from Alta Plaza Park, located approximately four blocks northeast of the project site in the area bounded by Scott, Jackson, Steiner, and Clay, Streets; Clay Street Mini-Park, located approximately four blocks northwest of the project site on the south side of Clay Street between Baker and Lyon Streets; Presidio Library Mini-Park, located approximately three blocks northwest of the project site on the north side of Sacramento Street between Baker and Lyon Streets; and Bush and Broderick Mini-Park, located approximately two blocks southwest of the project site on the south side of Bush Street between Broderick and Baker Streets. Due to the topography, the presence of intervening buildings, and the distance between the project site and this open space, the project would not be visible from this or other parks and, thus, would not block vistas from them. The proposed project, at 40 feet in height, would be visible from nearby street segments but would not obstruct public scenic views of the parks. Project impact on scenic vistas and views would be less than significant.

The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment that contribute to a scenic public setting, as there are no such features present on the project site.



The proposed project would be visible from some nearby residential buildings in the area. However, the magnitude of the effect on private views would be limited by the existing intervening Drew School and the church buildings on the southeast corner, and west of Broderick and California Streets. Also, the proposed addition would be similar in height to the existing 1831-1835 Broderick Street building. The proposed project's impact on private views would not rise to the level of a potentially significant environmental impact.

The proposed school addition would be architecturally consistent with the existing Drew School building and its California Street frontage. The courtyard void along Broderick Street would be continued with the proposed project. The massing of the addition would be similar to the existing school building on the Broderick Street side.

The proposed project would be 40 feet tall, similar in height to a number of the buildings in the immediate vicinity and shorter than the seven-story multi-family residential building on the northeast corner of California and Broderick Streets. It would be approximately the same height as the existing building, one story higher than the existing residences on the west side of Broderick, and about the same height as the existing buildings on the east side of Broderick Street. The proposed project would increase the prominence of the school along Broderick, but would be consistent with the visual character the Drew School has introduced into the existing neighborhood. Impacts to historic resources will be discussed in the EIR, and are discussed in this Initial Study on page 28.

Design and aesthetics are, by definition, subjective and open to interpretation by decision-makers and members of the public. A proposed project would therefore be considered to have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change. The proposed project would not cause such a change. While expanding the institutional presence on the immediate setting, the proposed project would not add a new or visually inconsistent presence to the area. For these reasons, the proposed project would not be expected to cause a substantial and demonstrable negative change or disruption to the existing visual character of the project vicinity. However, the project's environmental effect on aesthetics and urban design in the immediate setting will be presented in the EIR in the interest of disclosing and explaining these impacts.

The project would replace the street tree(s) removed along Broderick Street. A unique educational feature of the building would be a garden or "living wall" to promote habitat preservation on the exterior façade on Broderick Street wrapping around the corner on the north side (see Figure 10, page 11).

The lighting of the proposed addition would be similar to that of the existing school building. The Broderick Street frontage of this addition would not have glazing above the ground floor. The addition wall is north facing and the courtyard would have a bank of multistory windows at the assembly entrance (approximately 25 feet set back from the street). The addition would be expected to both add and reduce spillover lighting by adding illumination but blocking much of the street exposure with the mass of the new building.

The project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Mirrored glass would not be used in the new building. Exterior lighting would be consistent with similar exterior lighting and the fixtures would be directed to minimize the project site. For these reasons, the proposed project would not generate obtrusive light or glare that would substantially impact other properties and project impacts would be less than significant. For the aforementioned reasons, aesthetic impacts of the project would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>3. POPULATION AND HOUSING—</b> Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The 2000 U.S. Census indicates that the population in the project vicinity is approximately 1,867 persons.<sup>5</sup> In March 2001, the Association of Bay Area Governments (ABAG) projected regional needs in the Regional Housing Needs Determination (RHND) 1999-2006 allocation and calculated the jurisdictional

<sup>5</sup> The population estimate is based on data from the 2000 Census for Census Tract 153.



need of the City as 20,327 dwelling units, or an average yearly need of 2,716 net new dwelling units. Although not finalized at this time, the RHND 2006-2013 allocation for the City is anticipated to be higher than the 1999-2006 allocation.<sup>2</sup>

The project site contains three stacked, family-sized dwelling units and the existing Drew School. The proposed project would demolish the existing three-unit, 5,225 gsf residential building and the southern portion of the existing Drew School courtyard, to accommodate a 15,604-square-foot addition to the Drew School. The demolition of the three dwelling units would displace approximately six residents on the site,<sup>3</sup> and the school expansion would lead to the employment of an additional three faculty/administrative staff and accommodate an additional 37 students.<sup>4</sup> The existing residents are scheduled to vacate the units by June 2008. Drew school is providing relocation assistance to all current residents.

The net increase in daily onsite population would be approximately 34 people.<sup>2</sup> While noticeable to immediately adjacent neighbors, this increase would not result in a substantial impact on the population of the City and County of San Francisco. The net increase of 34 in the daily population at the project site would represent approximately 1.5 percent of the population near the project site, and less than 0.01 percent of the overall population of the City and County of San Francisco.<sup>6</sup> It is anticipated that most or all of the additional students and faculty/employees of the project would be individuals who currently reside in San Francisco or the region; therefore, the additional students and faculty/employees of the proposed project would not substantially increase the overall population of the City and County of San Francisco.

Although most of the three new jobs are anticipated to be filled by current residents of San Francisco or the Bay Area, up to three new employees could move to San Francisco or the Bay Area. Three workers would generate an increased demand for housing of up to approximately two dwelling units (at a ratio of

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<sup>2</sup> The Regional Housing Needs Allocation for the years of 2006-2014 is currently in its fourth revision. More information on this upcoming housing forecast for the Bay Area can be found at [www.abag.ca.gov/planning/housingneeds](http://www.abag.ca.gov/planning/housingneeds).

<sup>3</sup> For purposes of analysis, the residence is assumed to be habitable at the average household size for the census tract in which it is located. The project site is located in Census Tract 153, which according to Census 2000 data, has an average household size of 1.97 persons (1.90 per rental unit and 2.11 per owner-occupied unit). The citywide average household size for Census 2000 was 2.3 persons per household.

<sup>4</sup> Alice Suet Yee Barkley/Denis F. Shanagher, *Environmental Evaluation Application, Drew School*, revised January 18, 2007. Currently, Drew School has a total of 52 full and part time teachers and staff, and approximately 250 students. After completion of the proposed project, there would be 55 full and part time teachers and staff and 280 students.

<sup>2</sup> A 1999 conditional use authorization for the school capped the permitted school enrollment at 250 students..

<sup>6</sup> This calculation is based on the estimated Census 2000 population of 776,733 persons in San Francisco.



1.5 employees per household). In addition, displacement of the approximately six residents at the site would result in a demand for three dwelling units. In the context of the overall City housing demand, the demand for five dwelling units for project employees and displaced residents would not be considered to result in a "substantial" increase in demand or burden on new or replacement housing construction, representing 0.02 percent of the City's projected annual dwelling unit construction need. The vacancy rate for rental dwelling units in San Francisco is approximately 4.5 percent at the time of publication.<sup>3</sup> The loss of residential units, however, is also considered a policy issue by the Planning Department and mandatory discretionary review of the project will be taken by the Planning Commission.

The project would be located in an established urban neighborhood in an already developed area, and would not necessitate or induce the extension of municipal infrastructure. In light of the above, the project would not be expected to induce a substantial amount of growth. In conclusion, the proposed project would not induce substantial population growth nor create an additional substantial demand for housing resulting in significant physical environmental effects. The proposed project's population and housing impacts would, therefore, be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>4. CULTURAL AND PALEONTOLOGICAL RESOURCES—</b> Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco <i>Planning Code</i> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>3</sup> Information obtained from <http://www.sfaa.org/0712chappleau.html> Accessed on February 1, 2008.

## HISTORIC ARCHITECTURAL RESOURCES

The northern portion of the project site is currently occupied by the Drew School, constructed in 2001 and not considered an historic architectural resource. The southern portion of the project site is currently occupied by a three-story-over-basement residential building (1831-1835 Broderick Street) that was constructed in 1891, prior to the 1906 earthquake and fire, and designed by the architect-builder M. J. Welsh. It has been continuously used as residential flats since then. The building at 1831-1835 Broderick Street is not listed in Article 10 of the *Planning Code* (Preservation of Historical Architectural and Aesthetic Landmarks) or the 1976 Planning Department Survey, and is not a rated building in "Here Today" or by Heritage. Under the guidelines in *San Francisco Preservation Bulletin No. 16*, the building, which was constructed prior to 1906, "may be considered a historical resource because of its rarity and additional research will be required to determine whether they meet the California Register criteria and quality as 'historical resources' for purposes of CEQA." Preliminary research has been conducted that concludes that a potential historic district may exist in the area, based on shared architectural features. The period of significance would be from 1870, the beginning of the settlement of the area, to 1906.<sup>4</sup> Given the building's possible status as a historical resource as a contributor to a potential historic district, demolition of the building, as proposed, has the potential to cause a significant adverse affect to a historical architectural resource. The EIR will describe the history, architect, architectural character, and significance of the building on the project site. The EIR will include analysis of the appropriateness of the new design, and alternatives, including discussion of consistency with the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings.

## ARCHEOLOGICAL RESOURCES

The ground surface of the project site has already been disturbed by construction of the existing building and basement at 1831-1835 Broderick Street (on the southern portion of the project site) and the existing Drew School (on the northern portion of the project site). The project would require excavation as deep as approximately 12 feet below the existing sidewalk. The project site is underlain by a layer or layers of fill, under which lies fine-grained dune sand. The dune sand is underlain by medium-dense to very dense

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<sup>4</sup> Tim Kelley consulting, *Historical Evaluation, 1831-1835 Broderick Street, San Francisco California*. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.

clayey sand and sand with clay.<sup>5</sup> While (as discussed in Topic 13. Geology and Soils, below) the upper layer(s) of fill at the site were placed during construction of the existing structure, archeological resources present within the site would have been preserved within the native soils below. With implementation of **Mitigation Measure 1, page 76**, the proposed project's potential impact on CEQA-significant archeological resources, including human remains interred outside of formal cemeteries, would be reduced to a less-than-significant-level. Archeological resources, therefore, require no further analysis and will not be included in the EIR.

There are no known paleontological resources at the project site, and, therefore, the proposed project would not result in any adverse effects on paleontological resources.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>5. TRANSPORTATION AND CIRCULATION—</b>					
Would the project:					
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (unless it is practical to achieve the standard through increased use of alternative transportation modes)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>5</sup> Treadwell & Rollo, *Geotechnical Consultation, Assembly Wing Addition, Drew School, San Francisco, California*, 15 November 2006. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.



Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity that could not be accommodated by alternative solutions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., conflict with policies promoting bus turnouts, bicycle racks, etc.), or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project would not result in a change in air traffic patterns, and, therefore, would not result in substantial safety risks related to air traffic, and this issue is not addressed below.

A transportation study has been prepared for the proposed project and is summarized below.<sup>7</sup>

## STREET NETWORK

The project site is located in the Lower Pacific Heights area of San Francisco. California Street in the project vicinity is a two-way, east-west street with two travel lanes in each direction, and on-street parking on both sides. In the vicinity of the project, Broderick Street a two-way, north-south street with one travel lane in each direction, and on-street parking on both sides. Pine Street is a one-way westbound street in the vicinity of Drew School, with three travel lanes and on-street parking on both sides.

In the *General Plan*, California Street is designated as a Secondary Arterial in the vicinity of Drew School. Pine Street is designated as a Major Arterial and a Freight Traffic Route.

The intersections of California/Broderick and Pine/Broderick are signalized.

<sup>7</sup> CHS Consulting Group, *Drew School Assembly Wing Transportation Study*, February 2008. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.

## TRAFFIC

Intersection operating conditions are described by Level of Service (LOS), which provides a description of an intersection's performance based on traffic volumes, intersection capacity, and vehicle delays. LOS A represents freeflow conditions, with little or no delay, while LOS F represents congested conditions, with extremely long delays; LOS D (moderately high delays) is considered the lowest acceptable level in San Francisco.

The peak morning arrival time at the Drew School (the period of greatest school-generated traffic) coincides with the peak commuter hours on the adjacent streets. During the weekday a.m. peak hour, the intersections of California/Broderick and Pine/Broderick both operate at LOS B (a 13.8 second delay/per vehicle, and a 12.2 second delay/per vehicle, respectively).<sup>6</sup>

Approximately 65 percent of employees and 63 percent of students of the Drew School travel by auto (including students who are dropped off and who carpool!).<sup>8</sup> The additional three employees and 37 students would generate up to approximately additional 25 vehicle trips in the a.m. peak period. These trips would be added to the above intersections north and south of the project site. The proposed project may result in average delays of approximately 13.9 seconds per vehicle at the California/Broderick intersection (an increase of 0.1 second) and 12.4 seconds per vehicle at the Pine/Broderick intersection (an increase of 0.2). These 0.1 and 0.2 second increases in average delay would not be substantial and drivers would be unlikely to notice the delay. The proposed project would not change the Levels of Service "B" at the intersections. Project traffic volume impacts would be less than significant.

The Drew School has a policy that requires all parents to use the west side of Broderick Street for student drop-off and pick-up activities.<sup>9</sup> Field observation shows some parents double parked their vehicle and dropped off students on the east side of Broderick Street in the northbound direction. In addition, a few parents traveled northbound on Broderick Street and then made a left turn in front of the school garage driveway, partially blocking the sidewalk, dropped off students, and then reversed the vehicle to go south on Broderick towards Pine Street in both the a.m. and p.m. peak periods. Those students dropped off on the east side of Broderick Street usually jaywalked across the mid-block of Broderick Street. Double parking was also observed occasionally during drop-off and pick-up activities in both directions of

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<sup>6</sup> Ibid, page 14.

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.



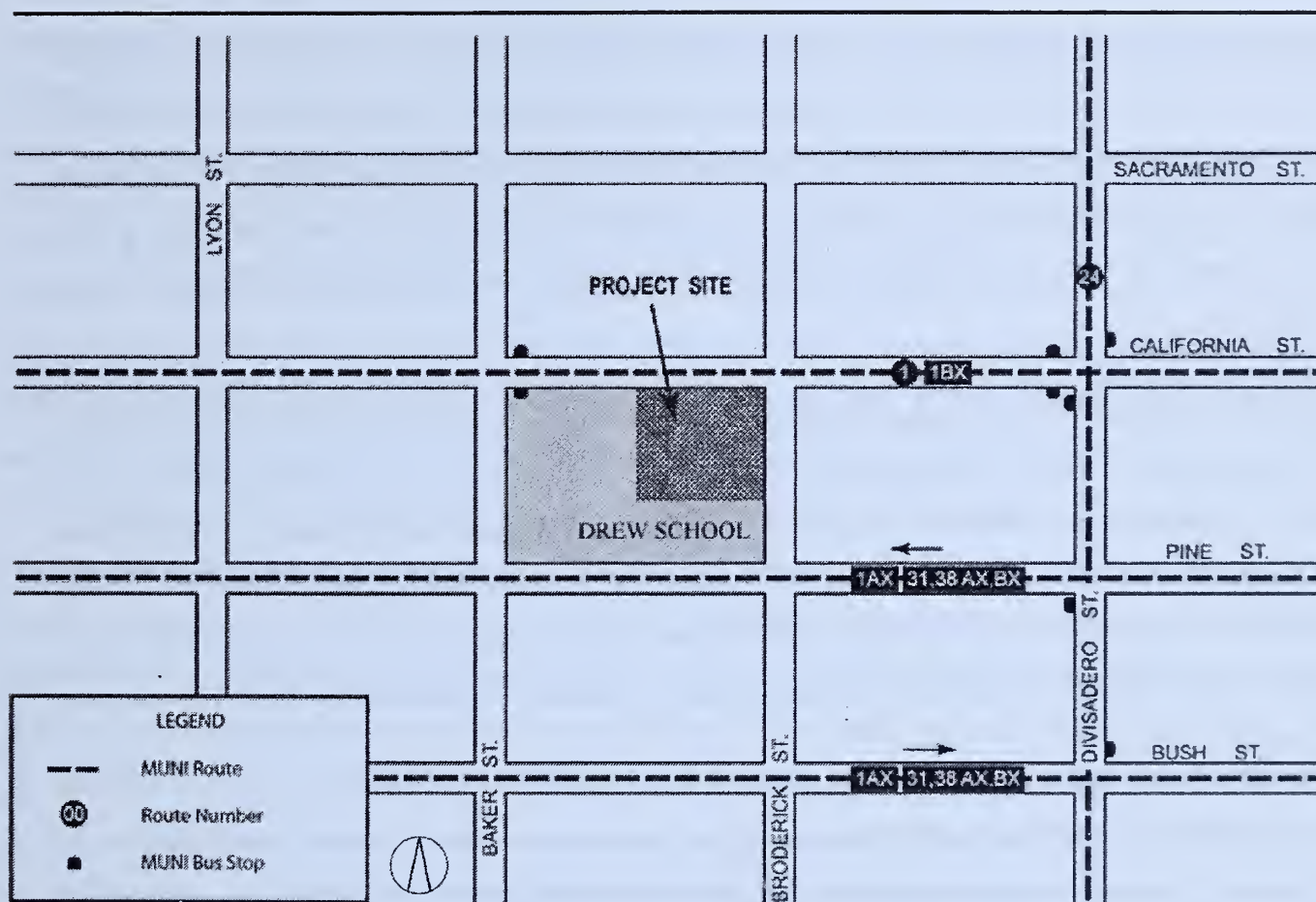
Broderick Street. This violation does not appear to pose significant traffic congestion or safety problems because traffic volume is light along this block of Broderick Street. It does cause a nuisance for the duration of the drop-off and pick-up periods, and potential safety concerns for students jaywalking across Broderick Street.

The project would incrementally contribute to the existing pick-up/drop-off activities along Broderick Street. Extending the existing white zone along Broderick Street, changing the hours of the white zone, providing additional transit information and bike education, incentivizing ride-sharing, continuing to enforce school pick-up/drop-off policy, and enforcing restrictions against left turns and U-turns in the middle of Broderick Street would reduce potential vehicle/vehicle and vehicle/pedestrian conflicts (see **Improvement Measures 1 through 4**, beginning on page 78).

Cumulative traffic growth would occur from other developments throughout San Francisco, as well as from the proposed project. Under 2025 Cumulative conditions, traffic is anticipated to increase in much of the City, and levels of service at some intersections may deteriorate to unacceptable levels (LOS E or LOS F). Although local neighborhood traffic would be expected to increase at intersections in the project vicinity, it is unlikely that the increase would be substantial because of limited neighborhood development potential. These conditions would occur with or without the project and the proposed project's contribution of 25 vehicle trips to total 2025 Cumulative volumes and to the growth between Existing and 2025 Cumulative conditions would be small. The project would therefore not be expected to contribute significantly to 2025 Cumulative conditions, and would not have any significant cumulative traffic impacts.

## TRANSIT

The project site is well served by public transit, with MUNI and regional transit providing service in the immediate vicinity (see Figure 13, page 33, for a map of existing transit networks and stop locations). MUNI lines passing within one block of the project site include the 1-California, 1AX-California "A" Express, 1BX-California "B" Express, 24-Divisadero, 31-Balboa, 38AX-Geary "A" Express, and 38BX-Geary "B" Express. The closest MUNI bus stops are at the intersections of California and Baker Streets (1-California), approximately one-half block (500 feet) west of the California Street pedestrian-only school entrance, and at California and Divisadero (1-California and 24--Divisadero), about one and one-half blocks (1,500 feet) from the same school entrance. The 1-California operates every three minutes, at approximately 56 percent of its capacity during the a.m. peak hour and the 24-Divisadero operates every



Source: CHS Consulting Group

2-6-08

Existing Transit Networks and Stop Locations Figure 13



7-8 minutes at about 37 percent capacity in the vicinity of Drew School. The 1BX-California and 38BX-Geary have a stop at the intersection of California and Presidio Avenue, approximately three blocks (3,000 feet) to the west of Drew School. The 31-Balboa has stops near the Divisadero/Pine intersection for westbound and the Divisadero/Bush intersection for eastbound vehicles, approximately one and one-half (1,500 feet) and two and one-half blocks (2,500 feet) to the south, respectively, from the Broderick Street school entrance.

The nearest BART station (Civic Center) is approximately 1.5 miles southeast of the project site on Market Street. It provides a direct connection to the 31-Balboa (three block walk north on Hyde Street to Turk Street). Connecting to the 38-Geary from the Civic Center BART Station would require an eight block walk north on Hyde Street to Geary Street, or exiting BART at the Montgomery Station for a direct connection. Exiting BART at the Embarcadero Station would provide a direct connection to the 1-California. Approximately 24 percent of employees and 27 percent of students of the Drew School travel by transit.<sup>10</sup>

The additional three employees and 37 students would generate approximately nine additional inbound transit trips in the a.m. peak period and nine additional outbound transit trips in the p.m. peak period. These trips would be distributed over the transit lines serving the area. The increase in transit demand associated with the project's twelve percent increase in student population and its nine additional transit trips would not noticeably affect transit services in the area or affect acceptable transit operations. As noted above, the 1-California operates at approximately 56 percent of its capacity during the a.m. peak hour and the 24-Divisadero operates at about 37 percent capacity in the vicinity of Drew School. In view of the above, project impacts on public transit would not be significant.

## PARKING

In the RM-1 district, the *Planning Code* parking requirement for secondary schools is one space per two classrooms. The existing Drew School has 29 classrooms and a parking garage with 21 spaces reserved for employees. It also leases 11 parking spaces in a church parking lot on the north side of Pine Street, west of Broderick Street, for its students and employees. With the four additional classrooms of the proposed expansion, the Drew School would have 33 classrooms, for which 17 spaces would be required. The proposed project would not add parking facilities. The existing 21 spaces would comply with the *Code*

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<sup>10</sup> Ibid.

requirement for parking, and no additional parking spaces would be required as part of the proposed expansion.

Approximately 65 percent of employees and 37 percent of students of the Drew School travel by auto (excluding students who are dropped off).<sup>11</sup> The additional three employees and 37 students would generate a demand of approximately 16 long-term parking spaces (which can differ from the *Planning Code* parking requirement). It is anticipated that the Drew School's new students and employees would park in the same locations as current students and employees: the Drew School's 21-space parking garage, an off-street church parking lot on the north side of Pine Street west of Broderick Street where 11 spaces are available to Drew School students and employees, and nearby streets. The 16-block area encompassing the project site has 703 on-street parking spaces, of which a survey found that 639 (91 percent) were occupied before 8:15 a.m. and 666 (95 percent) were occupied after 8:15 a.m.<sup>12</sup> While the project would not provide any additional parking spaces, the project-generated parking demand for 16 parking spaces would be less than the approximately 64 available on-street parking spaces in the surrounding 16-block area before 8:15 a.m. In any case, it should be noted that parking shortfalls are not considered significant environmental impacts in the urban context of San Francisco. Unavailability of nearby parking is an inconvenience to drivers, but not a significant physical impact on the environment. In support of the City's "Transit First" policy that emphasizes a shift from personal automobiles to public transit use, priority is given to transit improvements before developing transportation treatments that encourage the continued use of the automobile. Faced with parking shortages or inconvenience, drivers generally seek and find better alternative parking facilities or shift modes of travel (e.g., public transit, taxis, or bicycles). In view of the above discussion, the project would not cause a significant environmental impact. However, encouraging alternative modes of travel and car-sharing would lessen parking impacts (see **Improvement Measure 4**, page 80) and is consistent with the existing Conditional Use authorization conditions.

## PEDESTRIAN

California and Pine streets carry a relatively high volume of fast moving traffic. The closest signalized crossing is at the intersection of California Street and Broderick Street to the south. Each signalized intersection has crosswalks, including the intersection of California Street and Broderick Street.

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<sup>11</sup> Ibid.

<sup>12</sup> Ibid.



Pedestrian conditions in the vicinity of the project, on both sidewalks and crosswalks, were observed to be operating at acceptable levels of service. Pedestrian levels in the vicinity of the project, on both sidewalks and crosswalks, were observed to be low to moderate, with pedestrians able to move freely. No sidewalk or capacity-related issues were visible during field observations, but pedestrian-vehicle conflicts were observed during the 30 minutes before school begins and 30 minutes after school ends. Approximately five percent of employees and eight percent of students walk to the Drew School.<sup>13</sup> At these percentages, the additional three employees and 37 students would generate approximately three walk trips in the a.m. and p.m. peak hours. The project is not expected to substantially change the existing pedestrian conditions and would not result in any significant impacts on pedestrian conditions.

## BICYCLES

There are four designated Citywide Bicycle Routes in the vicinity of the project site (Route 10–Clay Street; Route 16–Post Street, Route 55–Presidio Street, Route 45–Steiner Street). During a field survey, few bicyclists were observed to be riding in the vicinity of the project site. Bicyclists would approach the school from any direction depending on the origin of their trip. Although the proposed project could result in an increase in the number of vehicles in the vicinity of the project site, this increase would not be substantial enough to affect bicycle travel in the area, and project impacts on bicycles would be less than significant.

There are two bike racks in the school's existing automobile garage with a capacity of 30 bike slots. No bicycle parking spaces would be provided in the proposed school expansion project, and none is required in the *Planning Code*.

## LOADING

The number of delivery and service vehicle trips to Drew School is relatively low. Trucks generally use Broderick Street next to the garage to unload. Mail deliveries, such as USPS, UPS, or FedEx, usually use California Street for a brief period. No obvious existing loading conflicts were observed. No off-street loading spaces would be provided in the proposed school expansion project, and none is required in the *Planning Code* for RM-1 districts. The number of additional delivery and service vehicles generated by the proposed 15,604-square-foot school expansion would be relatively low. Adding to the school's existing

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<sup>13</sup> Ibid.

demand, deliveries would include supplies, classroom materials, and possible stage performance materials, some of which would use standard delivery services like USPS, FedEx or UPS. There would be no change to the number of loading activities of these standard carriers, as new deliveries are expected to be consolidated with present deliveries. Deliveries are currently made without difficulty of conflict at the curb on California Street, where the Drew School has a pedestrian entrance. Any deliveries to the new addition could be made on Broderick Street, the location of the entrance to the Drew School's parking garage as well as a second pedestrian entrance. There would be little if any change from existing conditions where no conflicts have been observed.

If a parking space is not available to accommodate the loading demand, delivery and service vehicles would likely double-park on California or Broderick Streets. Near the project site, California Street has two travel lanes in each direction, and Broderick has one travel lane in each direction. Through traffic could bypass double-parked delivery and service vehicles. Because traffic on California Street is fast-moving, use of Broderick Street would be a safer place for delivery loading/unloading. However, double parking would not substantially affect traffic flow on either California or Broderick Streets, and would not result in a significant environmental impact.

## HAZARDS

As discussed above under Traffic, double-parking, turning movements, and pedestrian street crossings during drop-off and pick-up activities attributable to the building addition would incrementally contribute to, but would not result in new significant safety problems. **Improvement Measure 3, page 79,** would reduce vehicle/vehicle and vehicle/pedestrian conflicts. The proposed project would not include any features that would introduce hazards to the travel environment (e.g. visual distractions). For these reasons, these potential impacts would be considered less-than-significant and will not be discussed in the EIR further.

## CONSTRUCTION

The project construction duration is anticipated to be approximately 13 months and there would be a flow of construction-related trucks into and out of the site. Demolition and excavation stages would involve construction truck trips hauling excavated soil and demolished building materials off site. Foundation construction would also involve cement truck trips. Building construction (exterior, interior, finishing), would involve construction material delivery truck trips. All phases would involve



construction worker vehicle commute trips. All phases would require construction material storage and equipment staging, especially during the period of concrete pouring. The greatest number of construction trucks per day is estimated to be 12 during the first month, declining to four in the second month and ultimately two in the final three months.<sup>14</sup> In months seven and eight at the peak of construction, 40 construction worker vehicles per day are anticipated, varying from 14 vehicles per day in the first month to 24 vehicles per day in the 13<sup>th</sup> month. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect both traffic and transit operations. Pedestrian traffic may be interrupted by construction activities or materials staging. Construction workers who drive to the site would cause a temporary parking demand.

To address the construction impacts discussed in the preceding paragraph, the project sponsor proposes to develop a construction traffic management plan that would include the following topics: construction schedule, construction vehicle staging, construction truck route, size of construction vehicles, materials staging, pedestrian walkways, construction worker parking, construction traffic management, student pick-up and drop-off. The main proposals are discussed below, and the contractor would work with the City's Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) to finalize the construction traffic management plan.

Construction vehicles would enter the project site from California Street and exit to Pine Street. If an offsite staging area on Pine Street (discussed below) is employed, trucks would turn right to Baker Street, turn right again to California Street, and then turn right onto Broderick Street to enter the project site (see map on page 16 for reference). The size of construction vehicles would be limited to seven cubic yards in order to minimize construction traffic impacts, though on occasion bigger trucks may be required.

The construction contractor would hire a flagman to direct construction vehicle ingress and egress, and barricades and fences would be used to secure the construction site. The construction contractor would schedule the peak construction period, especially foundation and concrete pouring, during the summer when there are no school activities (from the second week of June to the end of August). Concrete pouring would typically take one day, but would require concrete trucks queuing in front of the construction site. Because concrete pouring must be continuous, concrete trucks would require either an offsite staging area or parking space in the vicinity of the construction site. The project sponsor would

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<sup>14</sup> Ibid.

coordinate with the Traffic Engineering Division of the Department of Parking and Traffic (DPT) and the Police Department to establish areas for offsite concrete truck staging. A potential area would be Pine Street between Divisadero and Baker Streets. Pine Street is a designated Freight Traffic Route, and operates one-way westbound with three traffic lanes and parking on both sides.

The project sponsor and construction contractor(s) would meet with the DPT and the Police Department to determine feasible traffic mitigation measures to reduce traffic congestion and other potential transit disruption and pedestrian circulation effects during construction of the project, including relocating the existing white zone from Broderick Street to California Street during the construction period (see **Improvement Measure 5, on page 80**).

There are no Muni bus stops on Broderick Street in front of the project block, and no bus stop relocation would be required. The construction contractor would install a temporary covered pedestrian walkway along the project frontage throughout the entire construction period, to allow continuous pedestrian flow along the west side of Broderick Street.

Construction workers who drive to the site would cause a temporary parking demand. As identified in the Construction Management Plan, the construction contractor would provide offsite parking for the construction workers, so construction workers would not occupy the limited number of on-street parking spaces in Lower Pacific Heights.

The impacts of construction on parking and traffic would be limited in scope and temporary in duration, and would not be significant. However, limiting construction-related truck traffic during peak periods would lessen construction period impacts (see **Improvement Measure 5, on page 80**).

## CONCLUSION

The proposed project would expand an existing school facility, and intensify land uses on the project site, but would not have a significant project or cumulative impact on intersection operations, transit demand, pedestrian circulation, bicycles, parking, traffic hazards, construction traffic, or adopted policies, plans, or programs (identified on page 18) supporting alternative transportation. The project site is not located near a public or private airport or within an airport land use plan area and significance criterion 5c would not apply. The proposed project also would not create a significant emergency access impact because the project site would not block streets and the site is accessible from major streets. The proposed project's traffic and circulation impacts would be less than significant under CEQA and implementation of



Improvement Measures 1 through 5 would lessen these impacts. Traffic and circulation will not be discussed in the EIR further.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
6. NOISE – Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed development would consist of school facilities. In areas with ambient noise levels below 65 decibels, the Environmental Protection Element of the *General Plan* states that construction of schools is "satisfactory, with no special noise insulation requirements," while in areas with ambient noise levels

above 65 decibels, "new construction or development should generally not be undertaken."<sup>15</sup> Background noise levels in the project vicinity have been measured at approximately 60 decibels.<sup>16</sup>

The nearest sensitive receptors to the project site would be students and employees of the existing Drew School, nearby residents, and churchgoers to the Seventh-Day Adventist Church (across the street at 2889 California Street).

## PROJECT NOISE

Based on published scientific acoustic studies, traffic volumes would need to approximately double to produce a noticeable increase in ambient noise levels in the area. The project's school expansion would generate a small increase in vehicle trips in the project vicinity (see Topic 5. Transportation and Circulation, Traffic, above). This increase in vehicle trips would result in a minimal addition to ambient noise levels and a less-than-significant impact.

The proposed project would likely include new mechanical equipment, such as air conditioning units and chillers, which could produce operational noise. These operations would be subject to Section 2909 of Article 29 (the Noise Ordinance) of the *San Francisco Police Code* that limits noise from building operations. Substantial increases in the ambient noise level due to building equipment noise of the proposed project would not be anticipated. The proposed project would therefore, result in a less-than-significant operational noise impact and the EIR will not discuss this issue.

Existing and project noise levels would therefore not substantially impact students, employees, or visitors at the project, and this issue will not be discussed in the EIR.

## CONSTRUCTION NOISE

Excavation and project construction would temporarily and intermittently increase noise and possibly vibration levels around the project site and may be considered an annoyance by occupants of nearby properties. Noise and vibration levels over the estimated 13-month construction period, would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Construction noise associated with the proposed

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<sup>15</sup> *San Francisco General Plan, Environmental Protection Element, Land Use Compatibility Chart for Community Noise.*

<sup>16</sup> *San Francisco General Plan, Environmental Protection Element, Map 1, Background Noise Levels, 1974.*



project—demolition, excavation, truck traffic, foundation construction, and exterior finish activities—would be noticeable. Of these, demolition, excavation, site work, and erection of the new building's exterior would likely generate the most construction-related noise. Throughout the construction period there would be truck traffic to and from the site, hauling away excavated materials and debris, or delivering building materials. It is anticipated that the construction hours would be normal working hours during the week, with possible limited work during nights or weekends.

The San Francisco Noise Ordinance (Article 29 of the *Police Code*) regulates construction-related noise. Although not listed as a mitigation measure, it is required by law and generally serves to mitigate significant negative impacts of project construction. The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA<sup>17</sup> at a distance of 100 feet from the source. Impact tools, such as jackhammers, must have both the intake and exhaust muffled to the satisfaction of the Director of Public Works. If the noise from the construction work would exceed the ambient noise levels at the property line of the site by five dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m., unless the Director of DPW authorizes a special permit for conducting the work during that period.

Because of the proximity of the proposed project to nearby sensitive receptors, and because construction would occur concurrent with school operations, additional measures have been identified to reduce impacts to sensitive receptors. Implementation of **Improvement Measure 6, page 80**, which would designate a coordinator to respond to any noise complaints and to coordinate with Drew School administrators as well as the Seventh-Day Adventist Church to limit disruptive noise during church services and school operations, in addition to establishing other noise control measures, would reduce construction noise impacts. **Improvement Measure 5**, proposed under Transportation, above, to minimize the disruption of traffic flow by limiting truck movement to the hours between 9:00 a.m. and 3:30 p.m., would also have the secondary effect of further reducing the construction noise impacts.

The project sponsors anticipate using isolated interior and continuous spread footing foundations. The proposed building expansion would not use pile driving. As a result, the proposed project would not create unusual levels of ground borne vibration that would disturb nearby residents or businesses, and vibration impacts would be less than significant.

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<sup>17</sup> dBA is the symbol for decibels using the A-weighted scale. A decibel is a unit of measurement for sound loudness (amplitude). The A-weighted scale is a logarithmic scale that approximates the sensitivity of the human ear.

The project site is not within an airport land use plan area, nor is it in the vicinity of a private airstrip, and therefore these issues are not discussed further.

Operational noise of the proposed project, including traffic-related noise would not significantly increase the ambient noise levels in the project vicinity. Compliance with the San Francisco Noise Ordinance and Title 24 *California Code* regulations would ensure existing noise levels would not significantly impact project students, employees, or visitors. Construction-related increases in noise and vibration resulting from project construction would not be considered a significant impact because of the temporary and intermittent nature of construction. Nonetheless, **Improvement Measure 6** would reduce temporary construction noise impacts on the conduct of classroom and church activities, and **Improvement Measure 5**, proposed above to reduce construction impacts on transportation and circulation, would have the secondary effect of further reducing construction noise impacts. Therefore, noise impacts of the proposed project would be considered less than significant and will not be discussed further in the EIR.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
<b>7. AIR QUALITY</b>					
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



The Federal Clean Air Act (CAA), as amended, and the California Clean Air Act (CCAA) legislate ambient air standards and related air quality reporting systems for regional regulatory agencies to then develop mobile and stationary source control measures to meet the standards. The Bay Area Air Quality Management District (BAAQMD) is the primary responsible regulatory agency in the Bay Area for planning, implementing, and enforcing the federal and state ambient standards for criteria pollutants.<sup>18</sup> Criteria air pollutants include ozone, carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and lead.

The San Francisco Bay Area Air Basin encompasses many counties including San Francisco, Alameda, Contra Costa, Marin, San Mateo, Napa and parts of Solano and Sonoma counties. The San Francisco Air Basin has a history of air quality violations for ozone, carbon monoxide, and particulate matter. The basin currently does not meet the State ambient air quality standards for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. BAAQMD has adopted air quality management plans over the years to address control methods and strategies to meet air quality standards, the latest plans being the *Bay Area 2000 Clean Air Plan*, *2001 Ozone Attainment Plan*, and *2005 Bay Area Ozone Strategy*.

## OPERATION EMISSIONS

According to the BAAQMD, vehicles are the primary source of operational project-related emissions.<sup>19</sup> The proposed project would affect local air quality by increasing vehicular traffic on nearby roads and at the project site, and by adding stationary emissions (mechanical equipment) to the project site. The BAAQMD has established thresholds of significance for project operations, listed in Table 1 page 45.

The BAAQMD has also established thresholds for which projects require review for potential air quality impacts.<sup>20</sup> These thresholds are based on the minimum size projects that the BAAQMD considers capable of producing air quality problems due to vehicular emissions. The BAAQMD generally does not recommend a detailed air quality analysis for projects that would generate fewer than 2,000 vehicle trips per day. The proposed project's approximately 15,604-square-foot expansion of the existing Drew School

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<sup>18</sup> State and Federal air quality standards and the Bay Area's attainment status can be viewed on the BAAQMD website at <http://www.baaqmd.gov>.

<sup>19</sup> Bay Area Air Quality Management District, *BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, December 1999.

<sup>20</sup> Ibid, page 25.

would be expected to generate well below 2,000 daily vehicle trips. Therefore, the proposed project would not exceed the BAAQMD thresholds.

<p><b>Table 1</b> <b>Pollutant Thresholds of Significance for Project Operations</b></p>			
<b>Pollutant</b>	<b>ton/year</b>	<b>pound/day</b>	<b>kilogram/day</b>
ROG <sup>1</sup>	15	80	36
NOx <sup>2</sup>	15	80	36
PM <sub>10</sub> <sup>3</sup>	15	80	36

Notes:

<sup>1</sup> Reactive organic gases

<sup>2</sup> Nitrous oxide

<sup>3</sup> Particulate matter with a diameter of less than 10 microns

Source: BAAQMD CEQA Guidelines, December 1999.

Additional stationary source emissions, generated by mechanical equipment, and the combustion of natural gas for building space and water heating would be relatively minimal, and would therefore be considered less than significant. The proposed project would not violate any BAAQMD ambient air quality standard or contribute substantially to an existing or projected air quality violation. For all of the above reasons, the proposed project would not generate significant operational air quality impacts.

The BAAQMD CEQA Guidelines indicate that for any project that does not individually have significant operational air quality impacts, the determination of whether it has a significant cumulative impact should be based on whether it is consistent with the *General Plan*. The proposed project, with its minor vehicle traffic and therefore pollutant contribution, would be generally consistent with the *General Plan* and, as such, air quality management plans such as the *Bay Area 2000 Clean Air Plan*, and the *Bay Area 2005 Ozone Strategy*. Additionally, the *General Plan*, the *Planning Code*, and the City Charter implement various transportation control measures identified in the *2005 Ozone Strategy* through the City's Transit First Program, bicycle parking requirements, transit development fees, and other actions. Accordingly, the proposed project would not contribute considerably to cumulative air quality impacts, nor would it interfere with implementation of the *2005 Ozone Strategy* or the *2001 Ozone Attainment Plan*, which are the applicable regional air quality plans developed to improve air quality towards attaining the state and



federal ambient air quality standards. As such the operational characteristics of the proposed project would not result in cumulatively considerable increases in regional air pollutants.

### *"Greenhouse Gas" Emissions*

Gases that trap heat in the atmosphere are often called greenhouse gases (GHGs). Both natural processes and human activities emit GHGs. The accumulation of GHGs in the atmosphere regulates the earth's temperature; however, emissions from human activities such as electricity production and vehicles have elevated the concentration of these gases in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to climate change. The principal greenhouse gases are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. Carbon dioxide is the "reference gas" for climate change, meaning that emissions of GHGs are typically reported in "carbon dioxide equivalent" measures.<sup>7</sup>

Of the principal gases, carbon dioxide (CO<sub>2</sub>) and methane are emitted in the greatest quantities from human activities. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs—with much greater heat-absorption potential than CO<sub>2</sub>—include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. There is international scientific consensus that human-caused increases in GHGs has and will continue to contribute to global warming, although there is much uncertainty concerning the magnitude and rate of the warming.

The California Energy Commission estimated that in 2004 California produced 500 million gross metric tons (about 550 million U.S. tons) of CO<sub>2</sub>-equivalent GHG emissions. The CEC found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 23 percent and industrial sources at 13 percent.<sup>8</sup>

In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of the Bay Area's GHG emissions, accounting for

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<sup>7</sup> Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

<sup>8</sup> California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004 -Final Staff Report*, publication # CEC-600-2006-013-SF, December 22, 2006; and January 23, 2007 update to that report. Available on the internet at: <http://www.arb.ca.gov/cc/ccei/emsinv/emsinv.htm>.

just over half of the Bay Area's 85 million tons of GHG emissions in 2002. Industrial and commercial sources were the second largest contributors of GHG emissions with about one-fourth of total emissions. Domestic sources (e.g., home water heaters, furnaces, etc.) account for about 11 percent of the Bay Area's GHG emissions, followed by power plants at seven percent. Oil refining currently accounts for approximately six percent of the total Bay Area GHG emissions.<sup>9</sup>

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emissions of GHG would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the ARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas Emissions Reduction Resolution, committing the City and County of San Francisco to a GHG emissions reductions goal of 20 percent below 1990 levels by the year 2012. In September 2004, the San Francisco Department of the Environment and the San Francisco Public Utilities Commission published the Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Emissions (Plan).<sup>10</sup> Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, it serves as a blueprint for GHG emission reductions.

Implementation of the proposed Drew School Addition would contribute to long-term increases in GHGs as a result of traffic increases (mobile sources) and residential and commercial building heating (area sources), as well as indirectly, through electricity generation. Direct project emissions of carbon dioxide, the primary greenhouse gas that would be emitted, would be an estimated 132 tons per year from mobile

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<sup>9</sup> BAAQMD, Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2002, November 2006. Available on the internet at: [http://www.baaqmd.gov/pln/ghg\\_emission\\_inventory.pdf](http://www.baaqmd.gov/pln/ghg_emission_inventory.pdf).

<sup>10</sup> San Francisco Department of the Environment and San Francisco Public Utilities Commission, Climate Action Plan for San Francisco, Local Actions to Reduce Greenhouse Emissions, September 2004.



sources (vehicular travel) and 33 tons per year from area sources (almost entirely natural gas combustion for heating, assuming a conventional gas-fired system), for a total of 165 tons per year,<sup>11</sup> or approximately two ten thousandths of a percent of the 85-million-ton total Bay Area GHG emissions for the year 2002..

The project's incremental increases in GHG emissions associated with traffic increases and space heating would contribute to regional and global increases in GHG emissions and associated climate change effects. Neither the BAAQMD nor any other agency has adopted significance criteria or methodologies for estimating a project's contribution of GHGs or evaluating its significance. However, no individual development project, such as the proposed Drew School Addition could, by itself, generate sufficient emissions of GHGs to result in a significant impact in the context of the cumulative effects of GHG emissions such that it would impair the state's ability to implement AB32.

As the project would be developed in an urban area with good transit access, the project's transportation-related GHG emissions would tend to be less relative to the same amount of population and employment growth elsewhere in the Bay Area, where transit service is generally less available than in the central city of San Francisco. As new construction, the residential portion of the proposed project would be required to meet California Energy Efficiency Standards for Residential and Nonresidential Buildings, helping to reduce future energy demand as well as reduce the project's contribution to cumulative regional GHG emissions. Any conclusion regarding the effect of the project's incremental contribution to cumulative GHG emissions levels is speculative, and therefore no determination of significance can be made at this time.

For the reasons discussed above, the proposed project would not be considered to have a significant impact on cumulative greenhouse gas in the Bay Area.

## ODORS

According to the BAAQMD, typical operational uses that may result in significant odor impacts include wastewater treatment plants, landfills, asphalt batch plants, chemical manufacturing, painting/coating operations, and coffee roasters. The proposed project would not increase or change perceptibly odors on the project site or in the vicinity of the proposed project, as it would not include uses with objectionable

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<sup>11</sup> Don Ballanti, Certified Consulting Meteorologist, *Urembis 2007 Combined Annual Emissions Reports (Tons/Year)* for the proposed Drew School Addition project, March 3, 2008. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.

odors. Observation indicates that surrounding land uses are not sources of objectionable odors that would adversely affect project students, employees, or visitors. Therefore, creation of objectionable odors would not be an impact of the proposed project.

## CONSTRUCTION EMISSIONS

Site preparation activities, such as demolition, excavation, grading, foundation construction, and other ground-disturbing construction activity would temporarily affect localized air quality during the construction phases for the proposed project causing temporary and intermittent increases in particulate dust and other pollutants. The movement of heavy equipment would create fugitive dust (particulate matter including PM<sub>10</sub> and PM<sub>2.5</sub>) and diesel fuel combustion would emit nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulphur dioxide (SO<sub>2</sub>), reactive organic gases or hydrocarbons (ROG or HC), and particulate matter with a diameter of less than 10 microns (PM<sub>10</sub>).

While construction emissions would occur in short-term, temporary phases, they could cause adverse effects on local air quality. Demolition and soil movement for foundation excavation lasting approximately one month would create the potential for wind-blown dust to add to the particulate matter in the local atmosphere during demolition activities and while open soil would be exposed. Although more of a nuisance than a health hazard to most people, the dust could affect persons with respiratory diseases immediately downwind of the site, as well as any sensitive electronics or communications equipment. Seniors, children or other potentially sensitive receptors near the proposed project may be exposed to some limited airborne dust associated with the project demolition and ground-disturbance activities. The BAAQMD, in its *CEQA Guidelines*, has identified a set of PM<sub>10</sub> and PM<sub>2.5</sub> control measures for construction activities such as twice daily watering of exposed soil areas, daily sweeping of surrounding streets, covering of construction vehicle loads, and on-going construction truck maintenance to minimize exhaust emissions. In order to reduce the quantity of dust generated during site preparation and construction, the project sponsor has agreed to implement **Mitigation Measure 2**, which lists BAAQMD PM<sub>10</sub> control measures for sensitive receptors (see Section F. Mitigation Measures and Improvement Measures, page 78). With the implementation of **Mitigation Measure 2**, construction-related air quality impacts of the proposed project would be reduced to a less-than-significant level.



## CONCLUSION

As discussed above, the proposed project would not conflict with applicable air quality plans, would not create significant operational or cumulative air emissions, would not have an impact on greenhouse gases, and would not create objectionable odors. With the implementation of **Mitigation Measure 2**, page 77, the proposed project's construction-related air quality impacts would be reduced to a less-than-significant level.

The EIR will therefore not include discussion relating to other air quality issues.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
8. WIND AND SHADOW – Would the project:					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## WIND

The Drew School project site is the northwest corner of the block bounded by California, Broderick, Pine, and Baker Streets (see Figures 1 and 2, pages 2 and 3). Directly west of the existing Drew School courtyard are some mature trees in the rear yards of residences on the project block. A parking lot extending northward from Pine Street backs up to the southwest corner of the project site. The project block is framed by rows of contiguous residential buildings, mostly three stories in height, along the south side of California Street, the north side of Pine Street, and the east side of Baker Street. These buildings, and the upwardly sloping terrain to the west, partially shelter the site from prevailing winds, including westerly winds. The proposed three-story-over-basement, 40-foot-tall addition would demolish the existing three-story residential building on Lot 3, and replace it with a building of approximately the same height, which would also be the same height as the existing three-story residential buildings to the south and the existing Drew School building to the north, and would be one story taller than the majority of buildings to the west.

The proposed project includes a roof area that could be used for outdoor education space; which would be at roughly the same height as the existing building's roof (see Figure 10, page 11). Exposure to westerly winds would not be expected to be substantially different from neighboring roof decks. As the proposed project would be roughly the same height as the existing structure on site as well as neighboring structures, the proposed project is not anticipated to increase wind exposure over existing conditions.

## SHADOW

*Planning Code* Section 295 was adopted in 1984 pursuant to voter approval of Proposition K, to prohibit new shadow on designated parks in the city during the period between one hour after sunrise and one hour before sunset, year round. Section 295 generally prohibits the construction of structures over 40 feet in height that would cause new shadow on any open space under the jurisdiction of or designated to be acquired by the Recreation and Park Commission, unless the Planning Commission, in consultation with the General Manager of the Recreation and Park Department, determines that the shade would not have a significant impact on the use of such property. At 40 feet in height, the proposed project would not be subject to the provisions of Section 295.

The proposed project would replace an existing three-story building with another structure of roughly the same height but with a larger floorplate. It would create new shadow on the courtyard within the project site. The new building could create some new morning shadow on the back yards and rear windows of properties west of the project site (2909 – 2913 California Street), although the effect would be limited by the orientation of the new structure to the sun and the shade of existing trees on those lots. The project's proposed enclosure of the courtyard onsite would create some new afternoon shade on the public sidewalks along Broderick Street. The proposed project would not increase the total amount of shading in the neighborhood above levels which are common and generally accepted in urban areas.

For the reasons above, the proposed project would not be considered to have a significant effect on shadows. Therefore, the EIR will not include a discussion relating to shadow issues.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
9. RECREATION—Would the project:					
a) Increase the use of existing neighborhood and	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?					
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project would result in net daily increase of 34 people on a site, which could increase demand for and use of recreation facilities in the immediate four-block vicinity of the project site. Such facilities include Alta Plaza Park, located approximately four blocks northeast of the project site in the area bounded by Scott, Steiner, Clay, and Jackson Streets; Clay Street Mini-Park, located approximately four blocks northwest of the project site on the south side of Clay Street between Baker and Lyon Streets; Presidio Library Mini-Park, located approximately three blocks northwest of the project site on the north side of Sacramento Street between Baker and Lyon Streets; and Bush and Broderick Mini-Park, located approximately two blocks southwest of the project site on the south side of Bush Street between Broderick and Baker Streets.

During school hours, the students take their breaks on the school premises. The proposed project's increase in students and employees would not be considered a substantial contribution to the existing demand for public recreational facilities in this area and would not result in substantial physical deterioration of existing recreational resources. The proposed project would not require the construction or expansion of offsite recreational facilities that might have an adverse physical effect on the environment. Therefore, the proposed project would have a less than significant impact with regard to recreation and this topic will not be discussed further in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
10. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
Board?					
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is within an urban area that is served by utility service systems, including water, wastewater and storm water collection and treatment, and solid waste collection and disposal. The proposed educational building expansion would increase demand for and use of such utilities and services, but not in excess of amounts expected and provided for in this area.

## SEWER AND WASTEWATER SERVICE

The project site is served by San Francisco's combined sewer system, which handles both sewage and stormwater runoff. The Southeast Water Pollution Control Plant (Southeast Plant) provides wastewater and stormwater treatment and management for the east side of the city, including the project site. No major new sewer or stormwater facilities or construction would be needed to serve the proposed project. The proposed project would meet the wastewater pre-treatment requirements of the San Francisco Public Utilities Commission, as required by the San Francisco Industrial Waste Ordinance in order to meet



Regional Water Quality Control Board requirements.<sup>21</sup> The project's 37 additional students and three employees would generate approximately 2,480 gallons of wastewater per day.<sup>22</sup> Since the project site is virtually completely covered with impervious surfaces, construction of the proposed project would not substantially increase the amount of stormwater runoff from the site. Additionally, as part of LEED certification, the project sponsor would investigate the possibility of both the capture and reuse of stormwater for irrigation and possibly for toilet flushing as well as irrigation recovery, storage and reuse systems, which would reduce stormwater runoff.

In San Francisco, stormwater runoff (as opposed to wastewater) contributes greatly to the total volume discharged through the combined sewer system. The 2,480 gallons of wastewater generated by the proposed project would represent a small increment of the total flow. The proposed project would not substantially increase the demand for wastewater treatment and would therefore result in a less-than-significant wastewater service impact. This topic will not be discussed further in the EIR.

## WATER SUPPLY FACILITIES

The proposed project, with an additional 37 students and three employees, would consume up to an estimated 2,046 gallons of water per day.<sup>23</sup> The three-unit residential building on the site currently consumes an estimated 372 gallons of water per day. Although the proposed project would incrementally increase the demand for water in San Francisco, the estimated increase in demand could be accommodated within anticipated water use and supply for San Francisco.<sup>24</sup>

The new construction would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the *California State Building Code* Section 402.0(c). As discussed under

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<sup>21</sup> City and County of San Francisco, Ordinance No. 19-92, *San Francisco Municipal Code* (Public Works), Part II, Chapter X, Article 4.1 (amended), January 13, 1992.

<sup>22</sup> The wastewater estimate for the proposed project is 62 gallons x 40 additional users or 2,480 gallons per day. The estimate of 62 gallons per capita per day of wastewater is based on residential water consumption estimates, which are consistent with water use assumptions incorporated within the San Francisco Public Utility Commission's Year 2000 Urban Water Management Plan.

<sup>23</sup> Based on current residential use in San Francisco of 62 gallons per capita per day (gpcd) (SFPUC, 2005 *Urban Water Management Plan for the City and County of San Francisco* (UWMP), December 2005, pages 40 and 41, available online at [http://sfwater.org/detail.cfm/MC\\_ID/7/MSD\\_ID/106/MTO\\_ID/NULL/C\\_ID/2776](http://sfwater.org/detail.cfm/MC_ID/7/MSD_ID/106/MTO_ID/NULL/C_ID/2776)). The 33 students and employees would consume approximately 2,046 gallons of water per day.

<sup>24</sup> San Francisco Public Utility Commission, 2005 UWMP. The 2005 UWMP uses the San Francisco Planning Department's current long range growth projections – *Land Use Allocation 2002* – an estimate of total growth expected in the City and County of San Francisco from 2000 – 2025. These projections have similar employment growth and approximately 15,000 higher household growth than ABAG Projections 2002.

Topic 7. Air Quality, during project construction, the project sponsor and project building contractor must comply with Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, which requires that non-potable water be used for dust control activities. As noted above, the project sponsor would investigate the possibility of both the capture and reuse of stormwater for irrigation and other uses. The project sponsor would also work with DBI plumbing engineers for potential incorporation of grey water to minimize potable water use to the maximum extent possible. Since the proposed project's water demand could be accommodated by the existing and planned supply anticipated under the San Francisco Public Utility Commission's 2005 *UWMP* and would use best-practice water conservation devices, it would not result in a substantial increase in water use and could be served from the existing water supply entitlements and resources. Therefore, the proposed project would result in less-than-significant project-specific and cumulative water impacts and this topic will not be further discussed in the EIR.

## **SOLID WASTE**

Solid waste would be collected by Sunset Scavenger Company, hauled to the Norcal transfer station near Candlestick Point, and recycled as feasible, with non-recyclables being disposed of at the Altamont Landfill, where it is required to meet federal, state, and local solid waste regulations. A substantial expansion of the Altamont Landfill, approved in 1997 and under construction will accommodate San Francisco's solid waste stream well into the future. Additionally, the City has a goal to divert most (75 percent) of its waste away from disposal (through recycling, composting, etc.) by 2010 and to divert all waste by 2020. Drew School has an existing infrastructure for occupant composting and recycling for their facilities. As mandated by local requirements, a construction waste management plan will reduce the amount of construction and demolition waste going to landfill by at least 75 percent. The solid waste that would be generated by project construction and operation would not substantially affect the projected life of the Altamont Landfill. Therefore, the proposed project would result in less-than-significant project-specific and cumulative solid waste impact, and will not be further discussed in the EIR.

## **CONCLUSION**

No new water delivery or wastewater collection and treatment facilities would be required to serve the proposed project. The proposed project's solid waste would be recycled as feasible at the Norcal transfer station, with non-recyclables disposed of at the Altamont Landfill, where adequate capacity exists to serve existing and future needs of San Francisco. The proposed project would incrementally increase the demand for water, wastewater, and other utilities onsite, but not in excess of anticipated demand



projected for the City of San Francisco. Therefore, the proposed project would result in a less-than-significant utilities and service systems impact and this topic will not be further discussed in the EIR.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
11. PUBLIC SERVICES—Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## POLICE AND FIRE PROTECTION

The project site receives police and fire protection services from the San Francisco Police Department and the San Francisco Fire Department, respectively. The proposed addition of approximately 37 students and three employees could incrementally increase the demand for fire and police services to the project site. Police protection is provided by the Richmond Station located at 461 Sixth Avenue, approximately 1.3 miles away. Although the proposed project could increase the number of calls received from the area as a result of the increased concentration of activity on site, the increase would not likely be substantial in light of the existing demand for police protection services in the Lower Pacific Heights area.

The nearest fire station is Station 10, located approximately four blocks away at 655 Presidio Avenue. The proposed addition would be required to comply with the current *Building Code's* fire safety and fire prevention standards. The increase in demand for fire protection services resulting from the proposed school expansion would not be substantially greater than existing demand for fire protection services in the project area. Meeting the additional demand for police and fire services would not require the construction of new police or fire prevention facilities. The proposed project would therefore, not result in a significant environmental impact and the EIR will not discuss police or fire protection services further.

## SCHOOLS

The nearest public elementary schools are the Dr. William L. Cobb Elementary School at 2725 California Street, approximately two blocks east of the site, and the Rosa Parks/Japanese Bilingual-Bicultural Program West at 1501 O'Farrell Street, approximately 0.75 mile southeast of the site. The nearest middle school is the Roosevelt Middle School at 460 Arguello Boulevard, approximately one mile west of the site, and the nearest high school is Ida B. Wells High School at 1099 Hayes Street, approximately one mile southeast of the site. The employment of approximately three additional faculty/administrative staff and their potential children could increase demand at nearby schools, although this demand would not be significant, given existing demand and capacity in existing San Francisco Unified School District schools. For this reason, the proposed project would not have a substantial impact on school facilities, and the EIR will not discuss school-related impacts further.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>12. BIOLOGICAL RESOURCES –</b> Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project would replace one three-story structure with another of similar size, utilizing a green wall and roof. The project site is currently virtually completely covered by impervious surfaces, and is within a developed area located within an urban setting. The site, therefore, does not provide habitat for any rare or endangered plant or animal species and the proposed project would not affect or substantially diminish plant or animal habitats, including riparian or wetland habitat. The proposed green wall and roof would add vegetation to the project site and possibly attract birds and insects. The proposed project would not interfere with any resident or migratory species, or affect any rare, threatened, or endangered species. There are no adopted habitat conservation plans applicable to the project site.

One or more of the three street trees along the Broderick Street frontage would be removed to facilitate construction and would be replaced. The two street trees along the California Street frontage would be retained. Four evergreen elm trees in the courtyard level of the school and thirteen white poplar trees at the edge of the courtyard would be removed and no additional landscaping is planned. The San Francisco Board of Supervisors recently adopted legislation that amended the City's Urban Forestry Ordinance, *Public Works Code* Sections 801 et. seq., to require a permit from the DPW to remove any protected trees. Protected trees include landmark trees, significant trees, or street trees located on private or public property anywhere within the territorial limits of the City and County of San Francisco. None of the trees that would be removed and replaced is landmark trees or significant trees (with a canopy in excess of 15 feet or a trunk diameter in excess of 12 inches). Based on the above, the proposed project would have no significant impact on biological resources, and the EIR will not analyze this issue further.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
13. GEOLOGY AND SOILS— Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist- Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the <i>Uniform Building Code</i> , creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The San Francisco *General Plan* Community Safety Element contains maps that show areas of the city subject to geologic hazards. The project site is located in an area subject to "strong" groundshaking (Modified Mercalli Intensity VII) from earthquakes along the Peninsula segment of the San Andreas Fault



and the Hayward Fault (Maps 2 and 3 of the Community Safety Element).<sup>12</sup> The project site is not within a high seismic hazard zone for liquefaction of seismically induced landslides, as shown on the official State of California Seismic Hazards Zone Map for San Francisco prepared under the Seismic Hazards Mapping Act of 1990.<sup>13</sup> The project site is not within an area subject to landslide (Map 5 of the Community Safety Element). The project site is not in an area subject to tsunami run-up, or reservoir inundation hazards (Maps 6 and 7 of the Community Safety Element).

The project site is not within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act and no known fault or potentially active fault exists on the site. Therefore, the risk of surface faulting is considered to be low. However, in a seismically active area, such as the San Francisco Bay area, the possibility exists for future faulting in areas where no faults previously existed. Furthermore, during an earthquake along any of the major faults mentioned above, the ground at the project site would experience strong to very strong shaking. Strong shaking during an earthquake can result in ground failure associated with soil liquefaction, lateral spreading, and differential compaction (also referred to as cyclic densification).

The project site slopes gently to the south, at an approximately five percent grade. The residential building occupies the entire southern portion of the project site, except for an approximately three feet rear yard along the western boundary of the property. The northern portion of the project site is occupied by the existing Drew School.

Based on the geotechnical report prepared for the project, a thin layer of sandy fill (probably less than two feet) may blanket the site.<sup>25</sup> The sandy fill is loose and contains fines; it was most likely placed by end dumping as part of the leveling process to develop residential lots in the area. Above this, fill material from the existing school site was placed beneath the existing podium (courtyard). This fill, which consists of dune and clayey sand, was placed as part of the construction of the existing Drew School to minimize

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<sup>12</sup> Continued research has resulted in revisions to ABAG's earthquake hazard maps. Available on the ABAG website (viewed March 2, 2008) at: <http://www.abag.ca.gov/bayarea/eqmaps/mapsba.html>. Based on the 1995 ABAG report, an earthquake on these faults could result in "moderate" and "nonstructural" damage, respectively, in the project vicinity. However, ABAG notes, "The damage, however, will not be uniform. Some buildings will experience substantially more damage than this overall level, and others will experience substantially less damage." For this reason, aBAG currently produces Shaking Hazard Maps that depict intensity of groundshaking, rather than estimated damage.

<sup>13</sup> The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This act requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these areas.

<sup>25</sup> Treadwell & Rollo, op cit.

soil off-haul from the site during construction. This material is not compacted. The fill is underlain by three to 6.5 feet of fine-grained dune sand, which is loose and may compress under moderate loadings. The dune sand is underlain by medium-dense to very dense clayey sand and sand with clay to the maximum depth explored during test borings in 1999 (Elevation 141.5 feet). Laboratory tests indicate these materials are strong and relatively incompressible under moderate loads. On the basis of known subsurface conditions in the site vicinity, the geotechnical report concluded that bedrock exists approximately 60 feet below the sidewalk grade, consisting of moderately to deeply weathered sandstone of the Franciscan Complex. Groundwater was encountered during the 1999 test borings at depths of 23 to 30 feet. The depth to the free groundwater may fluctuate with the seasons.

Approximately 29,000 cubic feet of soil would be removed during excavation for the proposed project.<sup>14</sup> The geotechnical analysis completed for the proposed project indicated that temporary shoring of adjacent properties would be conducted during excavation, and recommended a soldier pile and lagging system. The report noted that underpinning of the adjacent buildings may be required, and recommended spread footings be used. The analysis also made additional recommendations for site preparation and fill placement, basement floor design, wall strength that would withstand lateral pressure, seismic design, shoring design, and other geotechnical aspects of the proposed project. The geotechnical analysis found the site suitable for development provided that geotechnical recommendations were incorporated into the design and construction of the proposed project. The project sponsor has agreed to follow the recommendations of the current and any updated geotechnical report in constructing the proposed project.

Strong ground shaking can cause unsaturated sand above the groundwater table to densify and settle. At the project site, the approximately four feet of loose to medium dense sand would be removed as part of the project. Beneath the streets and sidewalks, where the sand would remain, the geotechnical consultant concluded that earthquake-induced settlement of the fill and native sand could be approximately one inch.

The final building plans would be reviewed by the Department of Building Inspection (DBI). In reviewing building plans, DBI refers to a variety of information sources to determine existing hazards and assess requirements for mitigation. Sources reviewed include maps of Special Geologic Study Areas and known landslide areas in San Francisco as well as the building inspectors' working knowledge of

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<sup>14</sup> Alice Suet Yee Barkley/Denis F. Shanagher, op cit.



areas of special geologic concern. The above referenced geotechnical investigation would be submitted to the DBI during its review of building permits for the site. Also, DBI could require preparation of additional site-specific soils report(s) in conjunction with permit applications, if needed. As noted above, the project sponsor has agreed to follow the recommendations of the current and any updated geotechnical report in constructing the proposed project.

Additionally, the project would be constructed to meet the current seismic engineering standards of the State *Building Code for Schools* that is prescribed by the Field Act which contain more stringent seismic safety requirements than the *San Francisco Building Code*. The project would provide maximum feasible protection for the students, faculty and support staff. While the project would expose more persons than at present to earthquake hazards in the project area, it would comply with current seismic and life safety requirements.

The proposed project would not substantially change the topography of the site or any unique geologic or physical features of the site.

For all of the above reasons, the proposed project would not result in significant impacts related to geology, topography, or seismic or soil hazards, either individually or cumulatively. The EIR will not further discuss these topics.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
14. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
in a manner that would result in substantial erosion of siltation on- or offsite?					
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project site is not located within a 100-year flood hazard area. As discussed above, the project site is not in an area subject to tsunami run-up, or reservoir inundation hazards (Maps 6, and 7 in the *General Plan* Community Safety Element). Groundwater is not used as a drinking water supply in the City and County of San Francisco.

## WATER QUALITY

The proposed project would not substantially degrade water quality or contaminate a public water supply. All wastewater from the proposed project building expansion, and stormwater runoff from the



project site, would flow into the city's combined sewer system to be treated at the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Treatment would be provided pursuant to the effluent discharge standards contained in the City's National Pollutant Discharge Elimination System (NPDES) permit for the plant. During operations and construction, the proposed project would be required to comply with all local wastewater discharge and water quality requirements. Therefore, the proposed project would not substantially degrade water quality.

## GROUNDWATER RESOURCES

As discussed in Topic 13. Geology and Soils, above, groundwater was encountered in test borings at depths of 23 to 30 feet. The depth to the free groundwater may fluctuate with the seasons.

Due to the anticipated depth of excavation of approximately 12 feet below the existing sidewalk, dewatering could be required during excavation. The Bureau of System Planning, Environment and Compliance of the Public Utilities Commission must be notified of projects requiring dewatering, and may require groundwater analysis before discharge. Any groundwater discharged during construction of the proposed project would be subject to requirements of the City's Industrial Waste Ordinance (Ordinance Number 199-77) that groundwater meet specified water quality standards before it may be discharged into the sewer system.

Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based on this discussion, the soils report would determine whether a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey were recommended, DBI would require that a Special Inspector (as defined in Article 3 of the *Building Code*) be retained by the project sponsor to perform this monitoring. Groundwater observation wells might be installed to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor. If dewatering were necessary, the project sponsor and its contractor would follow the geotechnical engineers' recommendations regarding dewatering to avoid settlement of adjacent streets, utilities, and buildings that could potentially occur as a result of dewatering.

The project site is virtually completely covered with impervious surfaces and natural groundwater flow would continue under and around the site. Construction of the proposed project would not substantially increase impervious surface coverage on the site nor reduce infiltration and groundwater recharge. Therefore, the proposed project would not substantially alter existing groundwater quality or surface flow conditions.

## EROSION AND FLOODING

As noted above, the project site is virtually completely covered with impervious surfaces and the proposed project would include a green wall and roof which would capture and reuse stormwater wherever possible, representing a decrease from existing conditions in the amount of impervious surfaces on the project site. As a result, no increase in the quantity and rate of stormwater runoff from the site that flows to the city's combined sewer system would be expected, and there may be a decrease. Any site runoff would continue to drain to the city's combined storm and sanitary sewer. The basement area of the building addition would be water tight to avoid the need to permanently pump and discharge water. Because stormwater flows from the proposed project could be accommodated by the existing combined sewer system, and because there would be no expected increase in stormwater flows, the proposed project would not significantly impact surface or ground water quality nor cause substantial flooding or erosion.

Over the construction period, there would be a potential for erosion and transportation of soil particles during site preparation, excavation, foundation pouring, and construction of the building shell. Once in surface water runoff, sediment and other pollutants could leave the construction site and ultimately be released into San Francisco Bay. As discussed above, stormwater runoff from project construction would drain to the combined sewer and stormwater system and be treated at the Southeast Water Pollution Control Plant. Pursuant to *Building Code* Chapter 33 (Excavation and Grading) and the City's NPDES permit, the project sponsor would be required to implement measures to reduce potential erosion impacts. Therefore, the proposed project would not substantially degrade water quality.

The City of San Francisco does not currently participate in the National Flood Insurance Program (NFIP) and no flood maps are published for the City. However, the Federal Emergency Management Agency (FEMA) is revising Flood Insurance Rate Maps (FIRMs), which support the NFIP, for San Francisco Bay Area communities. As part of this effort, FEMA plans to prepare a FIRM for the City and County of San Francisco for the first time. On September 21, 2007, FEMA issued a preliminary FIRM of San Francisco.



The preliminary map is for review and comment only; FEMA anticipates that the final map will be published in September 2008.<sup>15</sup> FEMA has tentatively identified special flood hazard areas (SFHAs)<sup>16</sup> along the City's shoreline in and along the San Francisco Bay consisting of "A zones" (areas subject to inundation by tidal surge) and "V zones" (areas subject to the additional hazards that accompany wave action). According to the preliminary map, the Drew School Addition project site is not within an A zone or a V zone.<sup>17</sup> In addition, there are no natural waterways within or near the project site that could cause stream-related flooding. The project site is not located within an area that would be flooded as the result of failure of a levee or dam,<sup>18</sup> nor is it located in an area identified for potential inundation in the event of a tsunami along the San Francisco coast, based on a 20-foot water level rise at the Golden Gate (Map 6 of the Community Safety Element of the *San Francisco General Plan*). In addition, the relatively flat and developed area of the project site would not be subject to mudflow.<sup>19</sup> Therefore, Checklist items 14g – 14j are not applicable to the project.

Based on the information presented above, the proposed project would not have significant water quality, groundwater, flooding, or erosion impacts nor be at risk from dam or levee failure or from seiche, tsunami, or mudflow inundation. Therefore, these topics will not be discussed further in the EIR.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
15. HAZARDS AND HAZARDOUS MATERIALS—Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>15</sup> City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, [http://www.sfgov.org/site/uploadedfiles/risk\\_management/factsheet.pdf](http://www.sfgov.org/site/uploadedfiles/risk_management/factsheet.pdf), accessed November 12, 2007.

<sup>16</sup> A special flood hazard area is the flood plain that is at risk from the 100-year flood (a flood having a one-percent chance of occurrence in a given year).

<sup>17</sup> Federal Emergency Management Agency, Preliminary Flood Insurance Rate Map, City and County of San Francisco, California, Panel 120, September 21, 2007, available on the Internet at [http://www.sfgov.org/site/uploadedimages/risk\\_management/j120A.jpg](http://www.sfgov.org/site/uploadedimages/risk_management/j120A.jpg), accessed November 12, 2007.

<sup>18</sup> ABAG, <http://www.abag.ca.gov/cgi-bin/pickdamx.pl>, accessed February 25, 2008.

<sup>19</sup> City and County of San Francisco, *City and County of San Francisco Emergency Operations Plan*, January 2005.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to <i>Government Code</i> Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## PROJECT SITE

The project site has been continuously occupied by the existing three-story residential structure since its construction in 1891.

A Phase I Environmental Site Assessment (ESA) was prepared for the project site.<sup>29</sup> An ESA assesses possible environmental concerns related to onsite or nearby chemical use, storage, handling, spillage,

<sup>29</sup> Innovative & Creative Environmental Solutions (ICES), *Phase I Environmental Site Assessment, 1831-1835 Broderick Street, San Francisco, California*, January 10, 2007. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.



and/or onsite disposal, with particular focus on potential degradation of soil or groundwater quality. The ESA also reviews the land use history of the project site and operating practices at or near the site to assess potential hazards from reported chemical releases on nearby properties and the potential migration of chemicals, contaminants, and toxics onto the project site.

A site inspection conducted for the Phase I ESA did not indicate the presence of transformers, aboveground or underground storage tanks, drums, or wells at the site. The project site is not on the Hazardous Waste and Substances Sites List, commonly called the "Cortese List," compiled by the California Department of Toxic Substances Control (DTSC) pursuant to *Government Code* Section 65962.5. The project site is not listed in database reports from State and federal regulatory agencies that identify businesses and properties that handle or have released hazardous materials or waste.

## **SURROUNDING AREA**

Surrounding property historically has been used primarily for residential purposes, in addition to the Drew School and the church located northeast of the site. In the database reports from State and federal regulatory agencies mentioned above, a total of 184 cases with possible releases of chemicals of concern to the environment were identified in the site vicinity within the area of the search. All of these cases are considered not to have impacted the project site because they have a status of no further action (NFA), were de-listed, have no reported violations, are approximately one-eighth mile or greater from the project site, and/or are cross- or down-gradient from the site. An NFA or de-listed status for a site/case indicates that chemical releases to the environment had not occurred or had been successfully remediated. Sites/cases with a "No Violations" notation have not had known releases of chemicals into the environment. The local topography suggests that local groundwater gradient flows in a southeasterly direction. It is, therefore, unlikely that properties situated in the cross- or down-gradient locations of the site could have impacted the site through groundwater flow.

Files at the San Francisco Department of Public Health (SFDPH) contain records of two nearby sites identified by the database reports mentioned above: 2890 California Street and 2952 California Street. At 2890 California Street, located north of the project site, one 1,500-gallon underground storage tank (UST) was removed in February 1995. Soil samples collected beneath the UST indicated total petroleum hydrocarbon (TPH) as diesel (TPHd) ranging from 2 mg/kg to 370 mg/kg, and non-detectable concentrations of benzene, toluene, ethylbenzene, and xylenes (BTEX). The affected soil was over-excavated and disposed offsite. Soil samples collected following over-excavation indicated non-detectable

concentrations of TPHd and BTEX. The site received a no further action status and regulatory case closure by SFDPH on August 16, 1995.

At 2952 California Street, located northwest of the project site, one 1,500-gallon underground storage tank (UST) was removed in April 1995. Soil samples collected beneath the UST indicated TPHd concentrations ranging from 65 mg/kg to 377 mg/kg, and non-detectable concentrations of BTEX. The affected soil was over-excavated and disposed offsite. Soil samples collected following over-excavation indicated non-detectable concentrations of TPHd and BTEX. The site received a no further action status and regulatory case closure by SFDPH on May 26, 1995.

Based on the information discussed above, the Phase I ESA found no environmental conditions at or near the site that require further investigation, but recommended that asbestos and lead surveys be conducted prior to demolition of the existing building (see Hazardous Building Materials, below).

## **HAZARDOUS BUILDING MATERIALS**

### **Asbestos**

Asbestos-containing materials may be found within the existing structure on the southern portion of the project site, which was constructed in 1891 and is proposed to be demolished as part of the project. Section 19827.5 of the *California Health and Safety Code*, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or asbestos abatement work. The notification must include: (1) the names and addresses of the operations; (2) the names and addresses of persons responsible; and (3) the location and description of the structure to be demolished/altered, including size, age, and prior use, and the approximate amount of friable asbestos; (4) scheduled starting and completion dates of demolition or asbestos abatement work; (5) nature of the planned work and methods to be employed; (6) procedures to be employed to meet BAAQMD requirements; (7) and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations. In addition, the BAAQMD will inspect any removal operation about which a complaint has been received.



Any ACBM disturbance at the project site would be subject to the requirements of BAAQMD Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing.

The local office of the State Occupational Safety and Health Administration must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California Law, DBI would not issue the required permit until the applicant has complied with the notice requirements described above.

These regulations and procedures established as part of the permit review process would ensure that any potential impacts due to asbestos would be reduced to a less-than-significant level.

### **Lead-Based Paint**

Lead paint may be found in the existing building on the southern portion of the project site, constructed in 1891 and proposed for demolition as part of the project. Demolition must be conducted in compliance with Section 3407 of the *San Francisco Building Code (Building Code)*, Work Practices for Exterior Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building, or the interior of occupied buildings (E3, R1, or R3 occupancy classifications) built prior to or on December 31, 1978, Section 3407 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Section 3407 applies to buildings or steel structures on which original construction was completed prior to 1979, which are assumed to have lead-based paint on their surfaces unless a certified lead inspector/assessor tests surfaces for lead and determines it is not present according to the definitions of Section 3407. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in HUD Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person

performing work subject to the ordinance shall make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The Ordinance also includes notification requirements, contents of notice, and requirements for project site signs. Prior to commencement of exterior work that disturbs or removes 100 or more square feet or 100 or more linear feet of lead-based paint in total, the responsible party must provide the Director of the DBI with written notice that describes the address and location of the proposed project; the scope and specific location of the work; whether the responsible party has reason to know or presume that lead-based paint is present; the methods and tools for paint disturbance and/or removal; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential; whether it is owner-occupied or rental property; the approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include: a Post Sign notifying the public of restricted access to work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

These regulations and procedures, already established as part of the building permit review process, would ensure that potential impacts of the proposed project due to the presence of lead-based paint would be reduced to a less-than-significant level.

## **OTHER POTENTIAL HAZARDOUS BUILDING MATERIALS**

In addition to asbestos-containing building materials and lead-based paint, the existing buildings on the project site may contain other potentially hazardous building materials such as polychlorinated biphenyl (PCB), contained primarily in exterior paint, sealants, electrical equipment, and fluorescent light fixtures. Fluorescent light bulbs are also regulated (for their disposal) due to their mercury content. Inadvertent release of such materials during demolition could expose construction workers, occupants, or visitors to these substances and could result in various adverse health effects if exposure were of sufficient quantity.



Although abatement or notification programs described above for asbestos and lead-based paint have not been adopted for PCB, mercury, other lead-containing materials, or other possible hazardous materials, items containing these substances that are intended for disposal must be managed as hazardous waste and handled in accordance with OSHA worker protection requirements. Potential impacts associated with encountering hazardous building materials such as PCB, mercury, and lead would be considered a potentially significant impact. Hazardous building materials sampling and abatement pursuant to existing regulations prior to demolition, as described in **Mitigation Measure 3, page 78** would reduce potential impacts associated with PCB, mercury, lead, and other toxic building substances in structures to a less-than-significant level. With **Mitigation Measure 3** implemented, the proposed demolition and construction of the school addition would not have the potential to pose a direct (through material removal, if required) or indirect (through transport of materials or accidental release) public health hazard to the surrounding neighborhood.

## **BUILDING OPERATION HAZARDS**

Operating the educational building expansion would involve handling a range of common types of hazardous commercial and household products, such as paints, cleaners, toners, solvents, disinfectants, and detergents. Businesses are required by law to ensure employee safety by identifying hazardous commercial products, and adequately training workers. Household products are labeled to inform users of potential risks and to instruct them in appropriate storage, handling, and disposal procedures. For these reasons, hazardous materials use for operating the proposed building addition would not pose a substantial public health or safety hazards to the surrounding area.

## **FIRE HAZARDS**

San Francisco ensures fire safety primarily through provisions of the *Building and Fire Codes*. The proposed project would conform to these standards, which will also include development of an emergency procedure manual and an exit drill plan. In this way, potential fire hazards (including those associated with hydrant water pressure and emergency access) would be mitigated during the permit review process. The project is an addition to a school and will incorporate the emergency procedure manual and an exit drill plan that are already in place in accordance with state law. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving fires.

## OTHER HAZARDS

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. As noted above, the proposed project would incorporate the emergency procedures and exit drill plan already in place for the school. The proposed project would not impair implementation of or physically interfere with any adopted emergency response or evacuation plans.

## CONCLUSION

Potential public health and safety hazards related to the possible presence of hazardous materials on the project site, to the routine use of hazardous materials, and to potential fire hazards in the proposed building expansion would be reduced to a less-than-significant level as a result of regulations and procedures already established as part of the building permit review process and **Mitigation Measure 3, page 78**. The EIR will therefore not further discuss hazardous materials.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>16. MINERAL AND ENERGY RESOURCES—</b> Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

No mineral resources are located on or near the project site; therefore the proposed project would not affect mineral resources. The proposed project would be an addition to an existing school and would not consume large amounts of fuel, water, or energy. Electric generation to serve the proposed project would consume additional natural gas and coal fuel. New buildings in San Francisco are required to conform to current state and local conservation standards, including Title 24 of the *California Code of Regulations*. DBI



enforces Title 24 compliance and documentation demonstrating compliance with these standards is submitted with the application for the building permit.

As part of the LEED certification process, the project sponsor intends for the project to be 21 to 24 percent better than the Title 24 standards. The project team would pursue a displacement air distribution system as an efficient way to deliver heat and provide temperature control. With this system, heat and/or cooled air will be placed down low in the space where it can most efficiently serve the needs of those using the space. Classrooms will be served by individual fan coil units connected to a variable refrigerant volume system and all windows are planned to be operable with a switch at each window, which will turn off the A/C when the windows are open.

The proposed project would not use substantial quantities of other non-renewable natural resources, or use fuel or water in an atypical or wasteful manner.

San Francisco consumers have experienced rising energy costs and uncertainties regarding the supply of electricity. The root causes of these conditions are under investigation and are the subject of much debate. Part of the problem may be that the State does not generate sufficient energy to meet its demand and must import energy from outside sources. Another part of the problem may be the lack of cost controls as a result of deregulation. The California Energy Commission (CEC) is currently considering applications for the development of new power-generating facilities in San Francisco, the Bay Area, and elsewhere in the State. These facilities could supply additional energy to the power supply "grid" within the next few years. These efforts, together with conservation, would be part of the statewide effort to achieve energy sufficiency. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco and the State, and would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the proposed project would not result in a significant physical environmental effect or contribute to a cumulative impact.

The proposed project would therefore not have a significant project-specific or cumulative effect on mineral or energy resources, and these topics will not be further discussed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>17. AGRICULTURE RESOURCES</b>					
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of Statewide Importance, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is located in a thoroughly developed urban area, within the City and County of San Francisco. No land within City boundaries is identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the Farmland Mapping and Monitoring Program maps. No land within City boundaries is designated as Williamson Act properties, or identified as important farmland by the California Department of Conservation.<sup>30</sup> The site is not zoned for potential agricultural use. Accordingly topics 17(a), (b), and (c) are not applicable to the proposed project, and will not be discussed in the EIR.

## F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The following are mitigation measures related to environmental effects determined to require no analysis in the EIR. The EIR will contain a mitigation chapter listing these measures as well as other measures that would be adopted to reduce potential adverse effects of the project identified in the EIR.

<sup>30</sup> San Francisco is identified as "Urban and Built Up Land" on the California Department of Conservation *Important Farmland of California Map*, 2002. This map is available for viewing on-line at the Department of Conservation website (<http://www.consrv.ca.gov>).



## MITIGATION MEASURES

The following mitigation measures have been adopted by the project sponsor and are necessary to reduce potential construction-related archeological, air quality, and hazardous building material impacts to a less-than-significant level.

### Mitigation Measure 1

#### *Archeological Resources (Accidental Discovery)*

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archaeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Major Environmental Analysis (MEA) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

## **Mitigation Measure 2**

### *Construction Air Quality*

The following measures from the BAAQMD *CEQA Guidelines* would reduce construction air quality impacts to a less-than-significant level. The project sponsor shall:

- Water all construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials *or* require all trucks to maintain at least two feet of freeboard.
- Apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers) if visible soil material is carried onto adjacent streets.



- Install wheel washers for all existing trucks, or wash off the tires or tracks of all trucks and equipment leaving the site.
- Install windbreaks, or plant trees/vegetative breaks at windward side(s) of construction areas.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.
- Limit the area subject to excavation, grading, and other construction activity at any one time.

Ordinance No. 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. The project sponsor shall require the construction contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose.

The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as prohibiting idling motors when equipment is not in use or when trucks are waiting in queues, and implementing specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

### **Mitigation Measure 3**

#### *Hazardous Building Materials (PCB, Mercury, Lead, and Others)*

Prior to demolition of the structure on site, the project sponsor shall ensure that pre-construction building surveys for PCB- and mercury-containing equipment, fluorescent lights, lead, mercury and other potentially toxic building materials are performed. Any hazardous building materials so discovered shall be abated according to federal, state, and local laws and regulations.

### **IMPROVEMENT MEASURES**

Improvement measures are recommendations to diminish the effects of the project that were found to result in less-than-significant impacts. Improvement measures designed to reduce already less-than-significant impacts are listed below, and would be implemented, with agreement from the project sponsor, and included in an update of existing Conditions of Approval through the Conditional Use authorization. Measures which add to or expand upon existing Conditions of Approval are noted. The existing conditions of approval will be reprinted in the EIR

## **Improvement Measure 1**

### *Extend White Zone Along Broderick Street*

The project sponsor would seek to extend the white zone on Broderick Street to California Street. If the DPT determines the measure feasible, extending the current white zone for student drop-off and pick-up would add two more parking spaces, and an extended white zone at this location would minimize double parking on Broderick Street. This measure would extend the white zone identified in the 1999 Conditional Use application to match the extended frontage of the Drew School Addition currently proposed.

## **Improvement Measure 2**

### *Modify Timing of Operation of White Zone*

The signage for the existing white zone on Broderick Street in front of the school is from 8:00 to 8:30 a.m. and from 1:30 to 3:30 p.m. Because there would be no need for student pickups until 3:00 p.m. from Monday to Thursday and until 2:30 p.m. for Fridays, the afternoon white zone period could be modified if the DPT determines the measure feasible. If determined feasible by the DPT, this measure would reduce the hours restricted for pick-up from the white zone fronting the project site, as reflected by signage.

## **Improvement Measure 3**

### *Educational Campaign and Implementation of School Pick-up/Drop-off Policy*

The school would conduct a more aggressive educational campaign, such as including the school pick-up/drop-off policy on the school web site, in a flyer to be distributed in the student registration package, parent contracts, and in General Assembly every semester. The school would note the license plate number of offending drivers, and send a courtesy letter explaining the violation of the school policy. This measure would expand on efforts identified in the 1999 Conditional Use application.



## **Improvement Measure 4**

### *Encourage Alternate Modes of Travel*

The school would seek to meet a "no net increase" on parking demand through encouraging use of alternative modes. The project sponsor would provide a transportation packet for the project faculty/employees and students that would provide information on bike routes, specific transit service (stop locations, MUNI and BART lines, schedules and fares, matching school arrival and departure times), information on where FastPasses could be purchased, and information on the 511 Regional Rideshare Program. The school would seek the cooperation of the parent organization to arrange carpooling and incentivize participation. This measure would expand on efforts identified in the 1999 Conditional Use application.

## **Improvement Measure 5**

### *Construction Traffic Measures*

The following measures would minimize disruption of the general traffic flow on adjacent streets:

- To the extent possible, truck movements should be limited to the hours between 9:00 a.m. and 3:30 p.m. (or other times, if approved by the Department of Parking and Traffic [DPT]).

The project sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic (DPT), the Police Department, the Fire Department, Muni's Street Operations and Special Events Office, the Planning Department, and other City agencies to determine feasible traffic measures to reduce traffic congestion and other potential transit disruption and pedestrian circulation effects during construction of the project, including temporary relocation of the existing white zone from Broderick Street to California Street during the construction period.

- The construction contractor would hire a flagman to direct construction vehicle ingress and egress, and barricades and fences would be used to secure the construction site.

## **Improvement Measure 6**

### *Construction Noise Measures*

The following standard measures, if implemented, would reduce the proposed project's construction noise impact on nearby sensitive receptors.

- Construction hours would be limited to the hours between 7:00 AM and 8:00 PM. A special permit should not be granted to extend hours unless there is an emergency because of the proximity of residential receptors.
- All internal combustion-driven construction equipment would be properly muffled and maintained. If an individual piece of construction equipment generates noise levels exceeding the noise limits set forth in the San Francisco Noise Ordinance, it would cease operating until it can be modified or replaced.
- Utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.
- Prohibit unnecessary idling of internal combustion engine.
- Erect temporary portable noise control screens around the area where the concrete saw is operating.
- Designate a "noise disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (e.g., starting too early, bad muffler, etc.) and institute reasonable measures warranted to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site.

In addition to the above standard measures, the measures below would further reduce the proposed project's construction noise impact on school and nearby church operations.

- The noise disturbance coordinator would coordinate with school administrators to minimize classroom disruption caused by impact and other tools during the construction period.
- The noise disturbance coordinator would coordinate construction activities with the Seventh Day Adventist Church (2889 California Street, at the southeast corner of Broderick and California Streets) in order to limit the use of impact tools during weekend and evening church services.

This improvement measure was not identified in the 1999 Conditional Use application.

## G. ALTERNATIVES

Alternatives to the proposed project would be defined further and described in the EIR. At a minimum, the alternatives analyzed would include the following:

1. A *No Project Alternative* in which the project site would remain in its existing condition with the existing buildings on the site, including the residential building at 1831-1835 Broderick Street.
2. A *Preservation Alternative*, expanding use only, in which the existing historic building on the southern portion of the site (1831-1835 Broderick Street) would be rehabilitated in



compliance with the Secretary of the Interior's standards and adaptively reused as part of the Drew School.

3. A *Partial Preservation Alternative* in which a segment of the existing historic building on the street-facing southern portion of the site (1831-1835 Broderick Street) would be retained as part of an expansion of the Drew School.
4. A *Residential Guidelines Alternative* in which new construction would be undertaken according to guidelines for historic districts and in conformity with the Residential Design Guidelines.

## H. PERMITS

The proposed project would require the following approvals:

- Conditional Use authorization (under *Planning Code* Section 303) for a school use in a RM-1 district *Planning Code* Section 209.3(h)). This authorization would amend the 1999 Conditional Use authorization for the existing school and increase the enrollment from 250 to 280 students.
- Variance (under *Planning Code* Section 305) from the rear yard requirement to provide necessary assembly space in the new building. (*Planning Code* Section 134(a)(2)).
- Discretionary Review by the Planning Commission for demolition of the three residential units on the project site. (*Planning Code* Section 311).

The project also would require approval by the Department of Building Inspection (DBI) for demolition and site or building permits, and approval by the Bureau of Streets and Mapping of the Department of Public Works for a parcel map merging Lot 3 and Lot 95, and street and sidewalk permits. Any curb or road modifications would require approval by the Department of Parking and Traffic.

The 1999 Conditional Use authorization allowed for the reconstruction and intensification of the existing school including increased enrollment from 200 to 250; provision of a 21- to 23-space parking garage, and the creation of a passenger loading zone on Broderick Street.<sup>20</sup> All the conditions of the original authorization would continue with the exception of the increase of enrollment to 280 students and the addition of the assembly wing.

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<sup>20</sup> Other conditions included prevention of student loitering in residential areas, containment of noise and light on school premises, prevention of double parking, encourage use of public transit and alternative means of transportation, appointment of a community liaison officer, provision of a traffic control monitor, and limitation of special evening and weekend events to two a month.

## I. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Mitigation Measures 1 to 3, contained in Section F. above, have been incorporated into the proposed project to address potential construction-related impacts to archeological resources, air quality, and hazardous building materials. Implementation of these measures would reduce these potential impacts of the proposed project to a less-than-significant level. The proposed project would have a significant effect on historic architectural resources, as the existing building to be demolished is a contributory historical architectural resource to a potential historic district. For this reason, demolition of the structure would also be a significant cumulative impact. Therefore, historic architectural resource impacts will be analyzed in the EIR and compared among project alternatives.



## J. DETERMINATION

On the basis of this initial study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

DATE

March 6, 2008

Bill Wycko

Bill Wycko  
Acting Environmental Review Officer  
for  
John Rahaim  
Director of Planning

## K. LIST OF PREPARERS

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Bonnie Fisher

## Appendix B

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### 1999 Conditions of Approval



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EXHIBIT A

CONDITIONS OF APPROVAL

The conditional use authorization herein is for the reconstruction and intensification of a private secondary school (The Drew School) which has operated at this location for almost 90 years, including the demolition of three existing buildings, merging of three lots into one parcel and construction of a three-story, 22,500 square-foot school building having 18 class rooms, accessory administrative, library, lab and studio space above 20 to 23 spaces of semi-subterranean parking (six to nine of which were required by the Commission) and increasing enrollment from 200 to 250 students, per Section 209.3(h) of the Code, in general conformity with the plans dated September 14, 1999 submitted as part of the application and on file with the Department in the docket for Case # 98.244C (labeled EXHIBIT B), reviewed and approved by the Commission on October 14, 1999 and subject to the following conditions.

1. Enrollment for the secondary school at the Project site shall be limited to a maximum of 250 students. Any increase in enrollment beyond 250 students at the Project Site shall require approval of a new conditional use authorization by the Commission.
2. Building area and massing authorized herein is limited to that described on the plans labeled Exhibit B. Additional building area or massing shall require approval of a new conditional use authorization by the Commission.
3. 20 to 23 off-street automobile parking spaces (six to nine more than the maximum number allowed as accessory under the Planning Code) and approximately 25 secure bicycle parking spaces shall be provided internal to the Project.
4. The Project shall be equipped with sufficient outdoor and indoor trash receptacles to avoid litter problems in the surrounding neighborhood.
5. The Applicant shall take all reasonable measures to prevent loitering by students (and possible associated nuisances) during break times or before and after classes in adjacent residential areas.
6. Noise and light shall be contained within the premises so as not to be a nuisance to nearby residents or neighbors. Project lighting shall be directed onto the property so as not to directly illuminate adjacent residents. Only non-reflective glass shall be used on the building exterior.
7. The Project school is fundamentally a day program, operating primarily during traditional school hours from September through June, excluding a limited number of small school or community functions in the evening and on weekends. Special weekend and evening



PLANNING COMMISSION

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The Drew School  
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events at the campus attended by more than 50 persons, such as open houses, fund raising, etc., shall not occur more frequently than twice per calendar month.

8. The Applicant shall establish a program to reduce vehicle usage by students and faculty and encourage transit and alternative means of transportation. Such program should include an advertised system of internally coordinating car pools, incentives and information regarding public transit, and encouragement of the use of bicycles. Information on such a program and advisement of the sensitivity of parking and drop-off loading in the area shall be included in student/parent and employee information packages.
9. The Applicant shall take all reasonable actions with the Department of Parking and Traffic to maintain the recently established loading only zone along the Broderick Street frontage of the site. Such loading zone shall only be in effect during the primary drop-off and pick-up times before and after school is in session, and outside of those periods be available for general neighborhood resident parking.
10. The Applicant shall provide attendants or monitors to supervise and direct traffic and parking adjacent to the Project campus during primary drop-off and pick-up times before and after school is in session to discourage double parking and promote the orderly flow of traffic.
11. The school operator shall take all reasonable actions to prevent any school related double parking or loading along the California Street frontage that might interfere with Muni Railway's operation of the 1 California trolley line.
12. The Applicant shall appoint a community liaison officer to deal with issues of concern to neighbors related to the operation of this Project. The name and telephone number of the community liaison shall be reported to the Zoning Administrator.
13. Should implementation of this Project result in complaints from neighborhood residents, which are not resolved by the Project Sponsor and are subsequently reported to the Zoning Administrator and found to be in violation of the Planning Code and/or the specific Conditions of Approval for the Project as set forth in Exhibit A of this Motion, the Zoning Administrator shall report such complaints to the Planning Commission which may thereafter hold a public hearing on the matter in accordance with the hearing notification and conduct procedures as set forth in Sections 174, 306.3 and 306.4 of the Code to consider revocation of this Conditional Use Authorization.
14. Should the monitoring of Conditions of Approval contained in Exhibit A of this Motion be required, the Project Sponsor or successor's shall pay fees as established in Planning Code Section 351(f)(2).

PLANNING COMMISSION

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15. Construction of the herein-authorized Project shall commence within three years of the date of this action and shall be, thenceforth, pursued diligently to completion or the said authorization shall become null and void.
16. The property owner shall record a copy of these conditions with the Office of the County Clerk/County Recorder.
17. The mitigation measures set forth in final negative declaration #98.244E for this project are herein incorporated as conditions of approval.

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## Appendix C

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### Historic Resource Evaluation Response

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# PLANNING DEPARTMENT

City and County of San Francisco • 1650 Mission Street, Suite 400 • San Francisco, California • 94103-2414

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## MEMORANDUM: Historic Resource Evaluation Response

**MEA Planner:** Leigh Kienker

**Project Address:** 2901 California Street  
aka 1831-1835 Broderick St.  
**Block:** 1029 **Lot:** 003  
**Case No.:** 2007.0128  
**Date of Review:** 08/23/07

**Planning Department Reviewer:**  
Tara Sullivan-Lenane  
415-558-6257  
[tara.sullivan-lenane@sfgov.org](mailto:tara.sullivan-lenane@sfgov.org)

### Preparer / Consultant

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### Owner

**Name:** Samuel M. Cuddeback III  
**Company:** Drew School  
**Address:** 2901 California Street  
San Francisco, CA 94118  
**Phone:** 415-409-3739  
**Fax:**  
**Email:** [sam@drewschool.org](mailto:sam@drewschool.org)

### PROPOSED PROJECT

- ☒ Demolition  
☐ Alteration

**Project description:** The proposed project consists of:

- The demolition of the existing three-story-above-basement apartment house; and
- The construction of a new three-story institution/education building.

### Pre-Existing Historic Rating / Survey:

- None.

### Historic District / Neighborhood Context:

1831-1835 Broderick Street is located on the west side of the street between California and Pine Streets in the southwest portion of the Pacific Heights neighborhood in San Francisco. One block from the Divisadero Street commercial neighborhood and half-block from the California Street commercial corridor, the building is surrounded primarily by residential land uses with commercial stores located towards Divisadero and California Streets. At the corner of California and Broderick Street is the Drew School (southwest corner) and the Seventh-Day Adventist Church (southeast corner). It is within an RM-1 District and a 40-X Height and Bulk District.

The area is characterized by small-and-medium-scale homes, most of which were constructed prior to 1900. There are a several apartment buildings that were constructed in the



1960's and 1970's interspersed between the older buildings. Building heights typically range from two stories above a ground floor to three stories. Building styles and ornamentation are in a variety of architectural types with the predominant style being Stick with Italianate and Edwardian structures interspersed throughout the area. The two structures to the south of 1831-1835 Broderick Street are contemporary in both age and style. There is a high concentration of buildings in the immediate vicinity of 1831-1835 Broderick Street that were included in the 1976 Citywide Architectural Survey and are in *Here Today*.

**1.) California Register Criteria of Significance:** Note, a building may be an historical resource if it meets any of the California Register criteria listed below. If more information is needed to make such a determination please specify what information is needed. *(This determination for California Register Eligibility is made based on existing data and research provided to the Planning Department by the above named preparer / consultant and other parties. Key pages of report and a photograph of the subject building are attached.)*

- **Event:** or ☐Yes ☒No ☐Unable to determine
- **Persons:** or ☐Yes ☒No ☐Unable to determine
- **Architecture:** or ☒Yes ☐No ☐Unable to determine
- **Information Potential:** ☐ Further investigation recommended.

**District or Context** ☒Yes, may contribute to a potential district or significant context

**If Yes; Period of significance: c. pre-1900 (appx. 1880-1910)**

Notes:

1831-1835 Broderick Street was designed by Thomas J. Welsh and constructed in 1891. A three-story-over-basement wood frame building, it was designed in the Stick style and features several characteristics of Stick buildings constructed in the era: the main façade has a pair of square-sided two-story bay windows at the second and third floors connected to a large box cornice/wide band of trim beneath the overhanging eave and brackets; a front-facing false gable roof; overhanging eave and brackets; a wide entrance at the northern side of the front façade with an arched lattice detail and decorative columns; a recessed entrance with decorative panels and columns; three wood-paneled entrance doors; a brick masonry base; segmental-headed pairs of one-over-one double-hung wood windows with decorative surrounds; and simple panels beneath the windows on the bays. The building is clad in simple drop horizontal wood siding, with fishscale and diamond shingles in the upper parapet/band of trim beneath the overhanging eave and brackets. The visible side facades are simple in detail and clad in horizontal wood siding.

The subject property does not appear to be eligible for listing in the California Register as an individual resource under Criteria 1, 2, or 3. The original owner of the building was Alexander Gibbons, a tailor who resided up the street at 1805 Broderick. He owned the building from its construction in 1891 until 1937, when it was sold to John S. Drew, the founder of the Drew Preparatory School. The Drew School building is located at the southwest corner of California and Broderick Streets (it should be noted that a contemporary school structure now exists on the site). The Drew School was founded in 1908 and located to its current location in 1911. The Drew family held the property until 1953, and records indicate that it was used as a rental property and not for academic purposes. The building was sold to Lewis Session in 1953 who worked as a crane operator for Bethlehem Steel Shipyard. In 1955 the building was sold to the Cotter Realty Company and has continued to be used as a rental property until present day. Records show that 1831-1835 Broderick Street was purchased by the Drew School in 2004. While 1831-1835 Broderick Street was owned for a period by John S. Drew and his family, who can be considered



significant persons in the history of San Francisco, records show that it was used as a residential rental property and that no one in the family had resided in the building nor was it used for educational purposes. In addition, research has not revealed information indicating that any subsequent owners or occupants of the building were associated with events or persons that have made a significant contribution to the broad patterns of history. Therefore, 1831-1835 Broderick Street does not meet Criterion 1 (Events) or 2 (Persons).

1831-1835 Broderick Street was designed by Michael J. Welsh. Michael was the elder brother of Thomas J. Welsh, a prolific and well-known architect in San Francisco in the late nineteenth century.<sup>1</sup> In addition to designing the original St. Mary's Cathedral and many other churches and religious structures in the Bay area, Thomas J. Welsh designed dozens of residential properties throughout the City. Michael J. Welsh apprenticed at his brother's firm and the two collaborated on several buildings together. Michael J. Welsh eventually started his own practice and there are over 100 known buildings that he designed throughout San Francisco.<sup>2</sup> The majority of these buildings are located in the southeast portion of the city, but there are a high concentration in the Haight-Ashbury and lower Pacific Heights neighborhoods. Michael J. Welsh is a significant architect who made a significant contribution to the built environment in San Francisco. Despite these facts, 1831-1835 Broderick Street is not individually eligible for the California Register of Historical Resources under Criterion 3 (architecture) because the building is not an excellent or outstanding example of Stick style architecture nor does it retain sufficient integrity to be individually listed.

However, 1831-1835 Broderick Street appears to be eligible for listing in the California Register as a contributor to a potential historic district based on its significance under Criterion 3 (Architecture). The area contains a high concentration of buildings that were constructed from approximately the early 1880's through the early 1900's, when the area was developed for residential housing. As a result of this development, there is considerable harmony among the houses and flats in the neighborhood. The building styles vary but the Stick style predominates, with several late Italianate and Edwardian buildings interspersed throughout the neighborhood. Most building details are intact; while there have been some alterations to buildings, the majority still possess the basic form, footprint, fenestration pattern, and ornamentation from when they were originally constructed. As noted above, the block (#1029) as well as the surrounding blocks contains a high concentration of buildings that are listed in both *Here Today* and in the 1976 Citywide Architectural Survey. The area is an excellent example of residential development from this period of San Francisco's history, expressed in well designed and highly articulated residential properties. The neighborhood has an extremely high degree of integrity in design, material, setting, and feeling. 1831-1835 Broderick Street retains sufficient integrity to convey its significance because it retains the majority of the features that illustrate its style in terms of massing, spatial relationships, proportion, pattern of windows and doors, and texture of materials and was constructed during the period of significance. In summary, the high concentration of architecturally significant buildings in the neighborhood indicates the existence of a potential district based on shared architectural characteristics and 1831-1835 Broderick Street is a contributor to this historic district.

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<sup>1</sup> Welsh, Patricia Ann, *Thomas John Welsh Architect, 1845 – 1918: A Journey of Discovery*. PAW Productions, San Francisco, CA. 1993, 1995.

<sup>2</sup> San Francisco Architectural Heritage: Michael J. Welsh architectural file.



**2.) Integrity** is the ability of a property to convey its significance. To be a resource for the purposes of CEQA, a property must not only be shown to be significant under the California Register criteria, but it also must have integrity. To retain historic integrity a property will always possess several, and usually most, of the aspects. The subject property has retained or lacks integrity from the period of significance noted above:

<b>location</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
<b>design</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
<b>materials</b>	<input type="checkbox"/> Retains	<input checked="" type="checkbox"/> Lacks
<b>workmanship</b>	<input type="checkbox"/> Retains	<input checked="" type="checkbox"/> Lacks

<b>setting</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
<b>feeling</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
<b>association</b>	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks

**Notes:**

1831-1835 Broderick Street retains a moderate degree of integrity, having undergone several alterations during its lifetime. The building features typical Stick style characteristics of the era such as the pair of two-story bay windows, bracketed cornice, segmented-headed windows with surrounds, recessed entrance doors and areaway and details such as arched lattice decoration, and corner boards.

Records show that the front façade underwent several alterations. In 1939 a permit was issued to "re-side front of building only with white PABCO Waterproofed Asbestos & Cement siding...remodel windows using 1 1/2 " rabbitted mouldings... rip and strip back fancy work." There are no records indicating whether this project was completed, nor are there records for the removal of the asbestos siding and restoration of historic details. There is evidence that this work was completed: the panels on the bay windows are shallow, the bottom of the bay windows are constructed of a newer plywood material, and the buildings is lacking some of the detailed ornamentation that is characteristic of the Stick style. However, 1831-1835 Broderick Street retains sufficient integrity to convey its significance because it retains the majority of the features that illustrate its style in terms of massing, spatial relationships, proportion, pattern of windows and doors, and texture of materials. The building reads as a late-nineteenth century Stick style residential building and shares similar characteristics of similar buildings in the neighborhood. The alterations have not degraded the integrity of the building. In addition, the missing ornamentation and details that are characteristic of the Stick style can be readily restored to the building based on the large number of Stick style buildings of similar form and age in the immediate neighborhood. Because there are specific motifs and details associated with the Stick style, missing details can be restored based on physical evidence on the building or based on like-buildings within the immediate area. In sum, 1831-1835 Broderick Street retains integrity of location, design, setting, feeling, and association.

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**3.) DETERMINATION Whether the property is an "historical resource" for purposes of CEQA**

☐ No Resource Present  
(Go to 6. below)

☒ Historical Resource Present  
(Continue to 4.)

☐ Category A (1/2)  
☒ Category B  
☐ Category C

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**4.) If the property appears to be an historical resource, whether the proposed project is consistent with the Secretary of Interior's Standards or if any proposed modifications would materially impair the resource (i.e. alter in an adverse manner those physical characteristics which justify the property's inclusion in any registry to which it belongs).**

☐ The project appears to meet the Secretary of the Interior's Standards. (go to 6. below)



(Optional) ☐ See attached explanation of how the project meets standards.

☒ The project is **NOT** consistent with the Secretary of the Interior's Standards and is a significant impact as proposed. (Continue to 5. if the project is an alteration)

The proposed project calls for the demolition of 1831-1835 Broderick Street, which is a historic resource because it is a contributor to a potential California Register Historic District based on the shared architectural characteristics. The proposal is not consistent with the Secretary of Interior's *Standards for the Treatment of Historic Properties* because it will adversely impact the resources integrity of design, setting, feeling, association, and workmanship – all of which form the character-defining features that give the building significance as a historic resource.

The proposed project is not consistent with the Secretary of the Interior's Standards for Rehabilitation, in particular Standards 1, 2, 5, and 9. Of note are:

Standard 2: The historic character of the property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

Standard 5: Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

In sum, since the proposal calls for the demolition of a historic resource, it does not meet the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, which calls for the retention and preservation of historic resources, not for the demolition of them.

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**5.) Character-defining features of the building to be retained or respected in order to avoid a significant adverse effect by the project, presently or cumulatively, as modifications to the project to reduce or avoid impacts. Please recommend conditions of approval that may be desirable to mitigate the project's adverse effects.**

1831-1835 Broderick Street should be retained and preserved and not demolished.

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**6.) Whether the proposed project may have an adverse effect on off-site historical resources, such as adjacent historic properties.**


☐ Yes ☒ No ☐ Unable to determine

The proposed project at 1831-1835 Broderick Street will have an adverse impact on a potential California Register Historic District located in this portion of the Pacific Heights neighborhood. The project as proposed consists of a large square-shaped masonry addition, with few window openings at the Broderick Street façade. While clearly differentiated from the historic structures in the neighborhood and designed to be compatible with the contemporary Drew School structure at the corner of Broderick and California Streets, the proposal does not

relate well to the street or relate to the historic structures in terms of fenestration pattern, scale, massing, and materials.

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**PRESERVATION COORDINATOR REVIEW**

Signature   
Mark Luellen, Preservation Coordinator

Date: 8.27.07

cc: S. Banks, Recording Secretary, Landmarks Preservation Advisory Board, V. Byrd, Historic Resource Impact Review File

PLACE  
POSTAGE  
HERE

San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Attn: Leigh Kienker  
Drew School

PLEASE CUT ALONG THE DOTTED LINE

*RETURN REQUEST REQUIRED FOR FINAL  
ENVIRONMENTAL IMPACT REPORT*



# REQUEST FOR FINAL ENVIRONMENTAL IMPACT REPORT

TO: Leigh Kienker  
Drew School

Check one box: ☐ Please send me a copy of the Final EIR on a CD.  
☐ Please send me a paper copy of the Final EIR.

Signed: \_\_\_\_\_

Print Your Name and Address Below

